

# City of St. Marks

P.O. Box 296 • 788 Port Leon Drive • St. Marks, FL 32355-0296

Phone: (850) 925-6224 • Fax: (850) 925-5657

January 16, 2014

Environmental Management Support, Inc.

Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Spring, MD 20910

Phone 301-589-5318

Dear Mr. West:

The City of St. Marks is pleased to submit the enclosed application to the FY 14 US EPA Brownfields Program for a site specific cleanup grant in the amount of \$200,000. This grant will support the City's continued efforts to remediate the former St. Marks refinery. Built in 1954, the refinery processed crude oil for jet fuel and asphalt, and manufactured specialty chemicals until it closed in 2001 after 47 years of operation. Abandoned by its previous owners, the City was left with a huge environmental quagmire and a gaping hole in the local economy. St. Marks acquired the property in 2010 through a Quit Claim Deed, as a result of foreclosure proceedings and payment of \$222,792.93 in real property taxes owed on the property.

The site consists of approximately 47 total acres and includes 10 upland acres adjacent to SR 363, which are suitable for commercial/industrial end-uses. The western portion of the site is developed with one single story office building, a fireproof storage shed, and a scale house. The improvements were the result of the former refinery operations and have been recently renovated for occupancy using general revenue funds. The eastern portion of the site, and subject of this application, contains a man-made engineered impoundment area built by FDEP. Environmental Site Assessments (ESAs) conducted on the site identified multiple areas with recognized environmental conditions (RECs). Previous assessment work has indicated that soil, sediment, ground water and surface water have all been impacted.

The City of St. Marks has expended significant funds in a multi-year effort to remediate the property and prepare it for redevelopment. A substantial amount of work and financial commitment from the Florida Department of Environmental Protection and Wakulla County has worked in concert with the City's efforts. These resources have been leveraged with a 2009 US EPA Brownfield Assessment award, which funded an updated Phase I ESA, Phase II ESA and an asbestos and lead survey. In addition the City's environmental consultant completed the removal of 11 ASTs and associated piping racks to provide access to conduct the final Phase II ESA activities. Through the enclosed application, the City is seeking \$200,000 in FY14 US EPA Brownfield Cleanup Grant funds to complete the following activities:

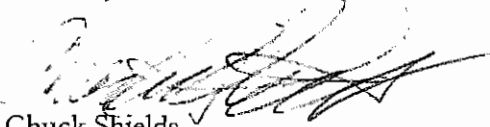
1. A Site-Specific Quality Assurance Project Plan (QAPP) and a Site Health and Safety Plan (HASP),
2. An EPA Analysis of Brownfields Cleanup Alternatives (ABCA) and the completion of a FDEP Remedial Action Plan (RAP) under the Florida Brownfields Cleanup Criteria rule, Chapter 62-785, Florida Administrative Code.
3. Remedial activities and confirmatory sampling in accordance with the Florida Brownfields Cleanup Criteria Rule, Chapter 62-785, Florida Administrative Code.
4. Revisions to the community relationship plan developed using the 2009 EPA Brownfields Assessment grant

This is the final step in removing the City's largest eyesore and greatest impediment to redeveloping the St. Marks community, as directed in the guiding visionary plan, *Plan St. Marks* in 2007 and the 2008 *St. Mark's Redevelopment Plan*.

Required Information		
<b>a. Applicant Information:</b>	The City of St. Marks PO Box 296 St, Marks, FL 32355	
<b>b. Applicant DUNS Number:</b>	025253188	
<b>c. Funding Request:</b>	<i>i.</i> Grant type – Cleanup <i>ii.</i> Federal Funds Requested: \$200,000 *requesting hardship waiver for 20% cost share <i>iii.</i> Contamination: Hazardous Substances and Petroleum	
<b>d. Location:</b>	City of St. Marks, Wakulla County, Florida	
<b>e. Site Locations:</b>	Former St. Marks Refinery Site 627 Port Leon Drive St. Marks, FL 32355	
<b>f. Contacts:</b>	<i>i.</i> Project Director: Zoe Mansfield City Manager, City of St. Marks PO Box 296 St, Marks, FL 32355 850-925-6224; 850-925-5657 fax cityofst.marks@comcast.net	<i>ii.</i> Highest Ranking Elected Official: Chuck Shields Mayor, City of St. Marks 130 Riverside Drive St. Marks, FL 32355 850-925-6158 Shieldsmarina_chuck@comcast.net
<b>g. Date Submitted:</b>	January 22, 2014	
<b>h. Project Period:</b>	Three years	
<b>i. Population:</b>	City of St Marks, FL: 188 ACS 5yr estimates	
<b>j. Special considerations</b>	See attached	

The City appreciates the opportunity to apply for FY 14 EPA Brownfields Cleanup funding to support environmental justice efforts and restoration of economic vitality in its communities. If you have any questions, please do not hesitate to contact the persons above.

Sincerely,

  
 Chuck Shields  
 Mayor, City of St. Marks, FL

## 1. Community Need

### a. **Targeted Community and Brownfields**

Targeted Community The City of St. Marks ("St. Marks") is a small, rural fishing community located in



Wakulla County, roughly 18 miles south of Tallahassee in Florida's Big Bend region where the state's Gulf of Mexico coastline changes from a north-south direction to an east-west direction. With a total area of 1.9 square miles and a population of just 293 residents, St. Marks is the only town on the St. Marks and Wakulla Rivers, which are recognized as Outstanding Florida Waterways. St. Marks has officially been designated as a Waterfronts Florida Program

Community. The small community is also home to the St. Marks National Wildlife Refuge Center and the historic St. Marks Lighthouse, operated by the U.S. Fish and Wildlife Service. Uplands forests, forested swamps, fresh and brackish water marshes and a pristine salt water estuary ecosystem compose this unique area of Florida's Gulf Coast, making the refuge a favorite for birders and outdoor enthusiasts alike.

Despite its small size and population, St. Marks has a long history and environmental legacy as a "port" town for offloading bulk petroleum products. Although St. Marks was incorporated in 1833, St. Marks is reportedly the 3<sup>rd</sup> oldest settlement in North America. The founding date of the settlement, by the Spanish, probably occurred on the feast day of the patron saint, St. Marks, as that name was applied to both the town and the river sometime in the early 1500's. The Spanish settled the area in 1528 and the San Marcos de Apalache fort was built in 1679 at the confluence of the St. Marks and Wakulla rivers. The fort has been designated a National Landmark and is operated by the state of Florida as a state park and museum. The Spanish, English, American and Confederate forces all occupied the fort and town throughout the area's significant early history and exploration northward of what is now known as the Big Bend area of Florida. For many years, limestone quarries, timber, fishing and agriculture provided the community with its livelihood. The completion of the 20-mile Tallahassee-St. Marks Railroad line in 1837 was Florida's first, conceived and financed by area of farmers and businesses to aid in transporting cotton crops and timber to the port at St. Marks. The railroad operated until 1983. The former railroad line was converted to the first Rails-to-Trails bike pathway in Florida and terminates in downtown St. Marks at the St. Marks River's northern bank.

In the early 1900's, St. Marks became well known for commercial and recreational fishing. In the 1940's and 50's Shell Island Fish Camp was built and continues to be one of the last traditional fish camps in the county. During this period, the timber industry, including turpentine and lumber production operated within the community. By the 1960's, storage, refining and transporting of petroleum products were the community's primary money makers. At the heart of this industrial complex was the 55 acre site that was home to the St. Marks Refinery. Built in 1954, the refinery processed crude oil for jet fuel and asphalt, and manufactured specialty chemicals until it closed in 2001 after 47 years of operation. During its operation the refinery was owned by several different entities. The refinery was the only facility of its kind in the state of Florida and the largest employer in St. Marks at its height of operation.

Today the former refinery site, consists of two distinct parcels - the East and West parcels. The site is the City's largest eyesore and a significant impediment to economic development. Located on the only roadway access into the community, State Road 363. The property was once owned by the American International Petroleum Corporation until the firm entered bankruptcy in 2005 after closing the facility in 2001. The owners simply walked away, leaving a huge environmental quagmire

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and a gaping hole in the local economy. The Florida Department of Environmental Protection (FDEP) unsuccessfully attempted to require the previous owners fund the required cleanup activities on the site. With the corporation responsible for the contamination being bankrupt, no responsible party was left to remediate the site. Beginning in 2005, the FDEP conducted a high-priority assessment and limited cleanup activities in order to protect the public health and safety of the surrounding community and to protect adjacent wetlands and the St. Marks River, an Outstanding Florida Waterway. Some areas were not fully delineated and others remained with contaminants of concern exceeding residential cleanup target levels. The FDEP did not completely remove all of the above ground storage tanks (ASTs) and piping infrastructure nor was the entire property consisting of 55 acres left in a marketable condition for redevelopment. To maximizing the potential for marketability and redevelopment and to achieve the highest and best reuse, the City acquired the property through bankruptcy proceedings and subdivided the 55 acres into two parcels: the West Parcel consisting of 47 acres fronting State Road 363 and the East Parcel consisting of 8 acres adjoining the St. Marks River. This proposal addresses the later site, the Eastern Parcel.

Demographic Information

	City of St. Marks	Wakulla County	State of Florida	United States
<b>Population:</b>	293 <sup>1</sup>	30,013 <sup>4</sup>	18,801,310 <sup>4</sup>	308,745,538 <sup>1</sup>
<b>Unemployment:</b>	8.5% <sup>4</sup>	9.9% <sup>2</sup>	8.8% <sup>2</sup>	7.2% <sup>2</sup>
<b>Poverty Rate:</b>	1.1% <sup>3,4</sup>	12.8% <sup>4</sup>	16.5% <sup>4</sup>	15.1 % <sup>3</sup>
<b>Percent Minority:</b>	1.6% <sup>4</sup>	16.8% <sup>4</sup>	25.% <sup>4</sup>	26.7% <sup>1</sup>
<b>Per Capita Income:</b>	\$45,136 <sup>4</sup>	\$22,089 <sup>4</sup>	\$26,551 <sup>4</sup>	\$27,334 <sup>4</sup>
<b>Median Household Income</b>	\$80,568 <sup>4</sup>	\$54,151 <sup>4</sup>	\$44,299 <sup>4</sup>	\$49,445 <sup>3</sup>
<sup>1</sup> Data is from the 2010 U.S. census data and is available at <a href="http://www.census.gov/">http://www.census.gov/</a> ; <sup>2</sup> Data is from the Bureau of Labor Statistics and is available at <a href="http://www.bls.gov/">www.bls.gov</a> ; <sup>3</sup> 2010 American Community Survey (factfinder2.census.gov); <sup>4</sup> 2011 American Community Survey (factfinder2.census.gov)				

The table above details the demographic detail of the City as reported by the 2010 Census and American Community Survey. **Accurate unemployment and socioeconomic rates, however, are nearly impossible to achieve in a community of only 293 and work force data is not available on a City level.** City staff, which knows the community's population personally, estimates that approximately 18% of work force residents are currently unemployed. The number would be much higher if it included those that are currently under-employed. High vacancy rates and little employment opportunity have drastically limited St. Mark's ability to redevelop its community.

Brownfields A citywide inventory was conducted through Environmental Data Resource Inc. (EDR). The report revealed 32 regulatory listed sites. While the number of sites is not tremendous, the size of the properties in relation to the small community and the extent of contamination are compelling. Previous assessments and monitoring on the former St. Marks refinery site have revealed impacts to the St. Marks River, adjacent wetlands and underlying groundwater with numerous substances, including hydrocarbons and dioxins. Specific contaminant include elevated concentrations of dioxin, pentachlorophenol, benz[a]anthracene, benz[a]pyrene, benz[a]flouranthene, dibenz[a,h]anthracene, ideno[1,2,3-cd]pyrene, 2-methylnapthalene, 2-methylphenol, aluminum, arsenic, manganese and benzene. A neighboring property has recently found dioxin and arsenic contamination on their property, believed to be from the refinery site. The report findings are illustrated in the table below.

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City-wide Data		#	Source (through EDR)
UST	Registered Underground Storage Tank Sites	4	FDEP Storage Tank Database & EDR
LUST	Leaking Underground Storage Tank Sites	2	FDEP Tank Facility Discharge Database & EDR
AST	Aboveground Storage Tank Sites	8	FDEP Tank Database & EDR
City-wide Data		#	Source
LAST	Leaking Aboveground Storage Tank Sites	4 *	FDEP Tank Facility Discharge Database & EDR
RCRA	EPA Resource Conservation & Recovery		
LQG	RCRA Large Quantity Generator	0	EPA RCRA Database
SQG	RCRA Small Quantity Generator	0	EPA RCRA Database
CESQG	Conditionally Exempt SQG	7	EPA RCRA Database
Non-Generator	RCRA Non-Generator (accumulation) Site	3	EPA RCRA Database
SWF/LF	Solid Waste/Landfill Facility	1	State/tribal Database
CERCLIS	Typically Superfund Sites	1	EPA RCRA Database
CORRACTS	RCRA Corrective Action Sites	1	EPA RCRA Database
Priority DC	Priority Dry Cleaner (documented impacts)	0	FDEP Dry Cleaning Program
Historical Auto Station	Based on city directory (prior to regulation)	1	EDR Proprietary Database

\* The AST and LAST sites include large-quantity bulk fuel facilities.

**Cumulative Environmental Issues** In addition to the enormity of the repercussions of its industrial past, there have been other significant setbacks for the community in recent years. Hurricane Dennis devastated the community in 2005, flooding the entire town and submerging the entire business district with over 6.5 feet of brackish water laying claim to many of the few remaining businesses. Prior to Dennis, the community had been able to maintain a vibrant waterfront with local restaurants, a small market and fishing-related family owned businesses. However, the impact of the 2005 flooding was so severe, that many residents and businesses opted not to rebuild within the community; reducing yet again the number of job opportunities. In April 2010 the Gulf of Mexico and St. Marks were impacted by the largest manmade oil spill – the Deepwater Horizon oil spill (a.k.a. BP oil spill) – which had immediate negative impacts to the fishing community operating out of St. Marks as fishing and shell fish grounds were placed off limits for fishing and the overall Florida tourism industry was and continues to be negatively impacted. The community was dealt another major blow by Tropical Storm Debby in June 2012 which dumped 18 inches of rain on the community in less than 36 hours. Again flooding of the business district was a major result.

Despite these hardships, St. Marks is working towards its future with a progressive vision. In 2007, the City began *Plan St. Marks*, a visioning and planning process to redevelop its community. In 2008, the City revised its *St. Marks Redevelopment Plan*, naming the redevelopment of brownfield sites with the community as a top priority. The award of its 2009 US EPA Brownfields Assessment Grant has allowed St. Marks to begin the redevelopment process by assessing several of the community's largest Brownfield sites. In preparation for its 2009 grant application, a survey of brownfields sites in St. Marks found six (6) sites of primary concern that, combined, comprise 8% of

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the town's total land area. The sites include:

- The former **St. Marks Refinery East Parcel** (total of 8 acres) is the subject of this application.
- The former **Murphy Oil Truck Terminal** (7 acres) is located across the street from the refinery site. The property was used for bulk petroleum storage and distribution. Petroleum is now delivered to the region by pipeline and the terminal is no longer needed. It is currently idle and vacant.
- The former **Asphalt Materials** (3 acres) is located adjacent to one of the City's residential communities. No longer in operation, the facility was previously used for asphalt production and is suspected of contamination from asphalt, dioxins, hydrocarbons and arsenic.
- The former **Mackenzie Service Company** (10 acres) was a light manufacturing and maintenance facility. It is suspected that this site is contaminated with solvents, lubricants and fuels. This site is located in the downtown/entertainment area of the City.
- The former **MacKenzie Tank Lines** (30 acres) was previously a bulk petroleum storage facility. The site is adjacent to "Marina Point," a proposed condominium development and marina.
- The former **Pelican Properties** (3 acres) is comprised of two properties in the downtown area of St. Marks. The two properties straddle Port Leon Drive and were previously used as petroleum tank storage areas.

**b. Impacts on Targeted Community**

The extent of the contamination of the East Parcel within the city limits of St. Marks poses a significant risk to the residents and is a major concern for the community. Hazardous contaminants, such as those found on the subject property cause serious health impacts on human population, particularly dioxins and arsenic. Risks include immune system damage (especially in children and the elderly), reproductive problems (miscarriage and sterility), birth defects, damage to internal organs such as the liver, kidneys, and digestive tract and cancer. High concentrations of dioxins can be lethal. Arsenic, another serious toxin, can cause intestinal disease, decreased production of red and white blood cells, skin irritation, reproductive problems, immune system damage and may increase the risk of certain types of cancer. Because plants absorb arsenic easily through soil and groundwater, the contaminant can quickly pass through the food chain to fish, birds and people.

The potential for toxic impacts to the surrounding environment is also a significant concern for the community. St. Marks is surrounded by rich and bio diverse marshland. The seepage of harmful hazardous contaminants outside of the brownfield sites has already been documented. These wetland areas are part of the 68,000 acre St. Marks National Wildlife Refuge, established in 1931 to provide wintering habitat for migratory birds. The area is also a popular regional site for fishing and boating, providing an easy pathway for contaminants to impact the community's vulnerable populations. It is highly probable that runoff from Hurricane Dennis in 2005 and Tropical Storm Debby in 2012 contaminated the nearby marshes. With no storm water collection system within St. Marks, future contamination is likely if preventative measures are not taken to remove or limited exposure to the legacy of contamination.

There are a number of health issues presented within the community that would suggest its population has been disproportionately impacted by environmental problems. The following table represents data provided by the Florida Dept. of Health ([www.floridacharts.com](http://www.floridacharts.com)) for the Wakulla County community where St. Marks is located. Values for the state of Florida are shown in parentheses:

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**Wakulla County Health Facts**

	<b>Wakulla County</b>	<b>Florida</b>		<b>Wakulla County</b>	<b>Florida</b>
Adults who currently smoke	26.5%	17.1%	Residents below 100% poverty	12.8%	14.7%
Stroke age-adjusted death rate/100,000	37.1	30.3	Colorectal cancer age-adjusted death/100,000	21.1	14.9
Lung cancer age-adjusted death rate/100,000	67.5	45.4	Lung cancer age adjusted incidence rate/100,000	92.3	65.2
Prostate cancer age-adjusted death/100,000	27.2	18.0	Adults who are overweight or obese	75.4%	65%
Adults who have been diagnosed with asthma	14.1%	8.3%	Low birth weights (<2500 grams)	9.5%	8.7%
Premature births (<37 weeks)	11.0%	13.8	Neonatal death rate/1,000	7.0	4.8

**Sensitive Populations.** Like many Florida communities, St. Marks has a large retiree population. Nearly 15% of the community is over 65 years of age, compared to 7.5% in the U.S. The City's median age is 46 compared to 41 in the state and 37 in the U.S. St. Marks has **twice as many veterans than the state as a whole and more than double the concentration of disabled individuals than the national average.** The elderly and disabled are more susceptible to environmental impacts and are therefore at greater risk than the general population. The proximity of the East Parcel to the elderly residents of St. Marks exposes this at risk population to the public health risks associated with hazardous substance contamination.

**c. Financial Need**

**i.) Economic Conditions**

St. Marks is a small, rural, fishing community, with an extremely limited tax base. The community has been hit hard by challenging economic times, job losses, natural disasters, man-made disasters (BP oil spill) and the steady loss of its employment and revenue generating bases. To compound these challenges, St. Marks is facing enormous environmental issues it does not have any hope of financing on its own due to its small tax base of property and sales taxes and the ever increasing reduction of state funding. With general operating revenues of just \$256,762, the City operates on finite resources. St. Marks is one of the smallest cities in terms of population for the state, ranked 387 out of 411 Florida Cities. To further compound the already finite resources of this small community, nearly 20% of residential properties are currently vacant according to the findings of the City's Redevelopment Planning process.

In addition to the toll of heavy petroleum related industries impacts over 30 plus years, mining and timber productions has had on the community, St. Marks has faced the devastating effects of a number of hurricanes. In fact, 35 hurricanes have landed within 25 miles of St. Marks since 1852. The most recent of these, Hurricane Dennis, hit in 2005 and laid claim to some of the oldest businesses in the area. Many of which have not been rebuilt after 7 years. There are less than 40 businesses in operation currently. Majority of these businesses are related to the fishing and crabbing industry with one to three employees employed and small waterfront restaurants where employees make minimum wages plus tips. St. Marks has a very limited ad valorem tax base of \$140,000 on which to draw general operating funds and relies heavily on state and federal grants to fund improvements within the community. Without financial assistance, St. Marks cannot financially afford to address



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the remaining environmental concerns of the East Parcel of the former St. Marks Refinery site. Further targeted assistance is required if St. Marks is to properly protect its local environmental and human resources and preserve the character of a rural and fishing community.

**ii.) Economic Effects of Brownfields**

The economic burden of brownfields, and specifically the subject property, have placed upon the small, rural community of St Marks was tremendous. The former St. Marks Refinery site, with the unsightly and abandoned ASTs and residual soil and groundwater contamination spread over the 55 acres, is located at the gateway to the community. To compound the marketability and redevelopment of the property, the bankrupt company left owing years of unpaid property taxes. St. Marks acquired the property in 2010 through a Quit Claim Deed, as a result of foreclosure proceedings and payment of \$222,792.93 in real property taxes owed on the property.

At the time of acquisition, there were 11 above ground storage tanks (ASTs) ranging in size from 1 million gallons to 50,000 gallons and associated piping and loading docks left from previous operations. The ASTs were in various decaying structural conditions with some walls exhibiting pin holes caused by metal oxidation. The various ASTs contained thousands of gallons of petroleum-based materials including mixed fuel oils and asphaltic-like material (Asphalt 20 and 30). A number of ASTs were wrapped in asbestos-containing material used to insulate the ASTs in order to store and transport the heavy asphaltic material.

St. Marks received a 2009 US EPA Brownfield Assessment award. An updated Phase I ESA and a Phase II ESA were conducted on the site as well as the aforementioned asbestos/lead survey. In addition the City's environmental consultant contracted the removal of 11 ASTs and associated piping racks in two (2) phases to provide access to conduct the Phase II ESA activities.

City officials spent considerable hours coordinating and negotiating the removal and recycling of approximately 400 tons of heavy asphaltic material from a million gallon AST prior to demolition of the 11 ASTs. This step was instrumental and would have been impossible without the direct involvement of St. Marks officials who arranged for recycling of the asphalt contents therefore saving thousands in disposal costs. City staff provided approximately \$2,810 in-kind services to identify, schedule and arrange for recycling of the asphalt contents. All scrap metal and other material with a market value from the demolition activities were recycled to leverage the 2009 EPA Assessment grant award. Approximately 500 tons of recycle metal were sold with an recycle value of \$115,238 which were applied to the overall project cost, therefore, furthering the use of the limited grant dollars that could be applied to the Phase II activities. In addition, demolition of the ASTs and piping racks was necessary to complete the Phase II ESA of the former tank farm area. However, there is still work to be finished and St. Marks will need additional support to ready the property for redevelopment.

**2. Project Description and Feasibility of Success**

**a. Project Description**

i.) Existing Conditions The Eastern Parcel consists of approximately 8 acres of waterfront uplands, former terminal loading dock/pier and adjacent wetlands suitable for redevelopment as marine sales/service or other marine commercial/industrial end-uses. The far eastern portion of the adjacent West Parcel contains a man-made impoundment area built by FDEP which compounds efforts to redevelop the entire parcel. The impoundment area was initially constructed as an environmental engineering control to control potentially impacted surface water and soil from leaving the property.

ii.) Proposed Cleanup Plan The East Parcel consists of approximately 8 acres of waterfront uplands,



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former terminal loading dock/pier and adjacent wetlands suitable for redevelopment as marine sales/service or other marine commercial/industrial end-uses. The improvements were the result of the former refinery operations, which took place on the subject property and the adjacent Western Parcel. There were 11 above ground storage tanks (ASTs) ranging in size from 1 million gallons to 50,000 gallons and associated piping and loading docks left from previous refinery operations. The eastern portion of the West Parcel, which directly abuts the subject property, contains a man-made engineered impoundment area built by FDEP which compounds efforts to redevelop the site.

Environmental Site Assessments (ESAs) conducted on the Eastern Parcel identified multiple areas with recognized environmental conditions (RECs). Previous assessment work has indicated that soil, sediment, ground water and surface water have all been impacted. The primary contaminants of concern include dioxins, metals, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi-volatile organic compounds. The Eastern Parcel became contaminated through historical use as the state's only refinery. Built in 1954, the refinery processed crude oil for jet fuel and asphalt, and manufactured specialty chemicals until it closed in 2001 after 47 years of operation.

**Soil Impacts** - Previous soil excavation activities have addressed several areas on the Eastern Parcel. However, soil impacts remain in the vicinity of the former AST's, petroleum product piping/off-loading areas and along Rattlesnake Branch creek. The anticipated remedial strategies for this site include removal of arsenic, barium, cadmium, selenium, vanadium, and petroleum impacted soil from three "hotspots" and capping approximately 1.26 acres with 2-feet of clean fill material and the No Action alternative for the remaining undevelopable areas of the site. Anticipated costs are outlined below:

- |  |          |
|--|----------|
| • Programmatic Support (outreach/CRP/QAPP/HASP)    | \$20,000 |
| • Remedial Planning/ABCA                           | \$20,000 |
| • Source Removal Activities 500 tons @ \$85/ton    | \$42,500 |
| • Confirmatory Sampling                            | \$10,000 |
| • Backfill and Capping 4,375 cubic yards @ \$20/cy | \$87,500 |
| • Preparation of EC/IC documentation               | \$20,000 |

St. Marks anticipates soil excavation and limited offsite disposal followed by confirmatory testing as the primary remedial strategy to achieve its remedial goal of meeting FDEP Soil Cleanup Target Levels (SCTLs) for Direct Exposure risks to humans under the Commercial/Industrial Scenario. Use of clean fill or other engineering control to cap or eliminate direct exposure will also be incorporated into the remedial strategy. The limited impacted soil will be transported and disposed at an approved landfill; manifests will be maintained for all material removed from the site. Clean fill material brought onto the property will be compacted and the property will be restored as close as possible to its original surface elevation. Any fill material brought to the site will adhere to the recently released FDEP guidance which addresses sampling of fill material before transport and placement on a site undergoing remedial measures. These guidelines provide procedures to eliminate use of fill material that does not meet the state's guidelines for "clean fill." Another source of fill material will be the existing berms constructed around the impoundment area. As the weir is lowered the height of the surrounding berm can be lowered too. Therefore, it will provide a clean source of fill dirt to cap the exposed soil. Upon completion of soil remediation activities at the property, soil samples will be collected from the remediated areas and laboratory analyzed to confirm the soil is within state SCTLs for Commercial uses. Further, soil samples will be taken and tested in the areas where contamination was previously detected on the property. Upon receipt of

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laboratory data, a Source Removal Report will be prepared, including manifests for material removed from the site, confirmatory laboratory data, figures with sampling locations and area remediated, summary tables and figures. Use of deed restrictions (institutional controls) and engineering controls including capping for commercial/industrial uses will be implemented to eliminate or reduce human exposure to acceptable state cleanup levels for the intended reuse as marine sales/service or other marine commercial/industrial end-uses.

**Groundwater Impacts** - The final groundwater remedy is anticipated to include continued FDEP approved monitoring and establishing an institutional control (deed restriction) to prevent groundwater use.

**Potential Site Reuse:** The eastern parcel is perfectly positioned to be redeveloped as marine sales/service or other marine commercial/industrial end-uses. The access and close proximity to a navigable river with access to the Gulf of Mexico and the soon-to-be enhanced Panama Canal are considerable economic draws for small to medium sized businesses relocating or start-up businesses in need of water access to expand their markets. The successful cleanup/redevelopment of this site will stimulate economic and sustainable redevelopment, increase open space/greenspace, and help to affect environmental justice in an area that has inherited a very negative environmental legacy. The successful remediation of the eastern parcel is the final step in preparing the site for redevelopment. St. Marks hopes that the revitalization of the entire site will demonstrate how other blighted properties can be successfully reborn into sustainable, productive developments.

**b. Task Description and Budget Table**

The City is requesting \$200,000 in cleanup funds and a hardship waiver for the 20% cost share match to begin remediation/capping activities for the East Parcel of the former St. Marks Refinery. The proposed funding will be used to address initial cleanup activities at the site, including development of a site specific QAPP, revision to the Assessment CRP, a site health and safety plan, preparation of a remedial action plan in accordance with an approved ABCA, excavation of contaminated soils, back fill with clean soil and confirmatory soil sampling and the preparation of engineering and institutional controls. This funding will allow the property to be remediated and marketed as an environmentally sound property available for investment. Specifically, redevelopment of the property as marine sales/service or other marine commercial/industrial end-uses is planned. Concentrations of the target parameters must be reduced to acceptable FDEP regulatory cleanup target levels for commercial/industrial development with limited human exposure and access. A hardship waiver request is attached (Appendix F).

<b>Budget Categories</b>	<b>Task 1 QAPP and H&amp;S Plan</b>	<b>Task 2 Final ABCA/ Remedial Action Plan</b>	<b>Task 3 Cleanup Activities &amp; Confirmatory Sampling</b>	<b>Task 4 Programmatic Support/CRP/ Outreach</b>	<b>TOTAL</b>
<b>Travel</b>				\$1,000	\$1,000
<b>Supplies</b>				\$500	\$500
<b>Contractual</b>	\$3,500	\$20,000	\$160,000	\$15,000	\$198,500
<b>Total Federal Funding</b>	<b>\$3,500</b>	<b>\$20,000</b>	<b>\$160,000</b>	<b>\$16,500</b>	<b>\$200,000*</b>
<b>Cost Share*</b>					<b>\$40,000</b>
<b>Total Budget</b>					<b>\$240,000</b>

\* Please see Appendix F – Cost-Share Waiver Request for the 20% Cost Match.

**TASK 1: Development of a Site-Specific Quality Assurance Project Plan and a Site Health and Safety Plan.** \$3,500 has been budgeted for the preparation of a Site-Specific Quality Assurance Project Plan

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(QAPP) and a Site Health and Safety Plan (HASP), consistent with EPA Region IV QAPP guidelines and FDEP Standard Operating Procedures. A Generic Quality Assurance Project Plan (QAPP) has already been prepared and approved under the US EPA 2009 Brownfields Assessment Grant.

**TASK 2: Analysis of Brownfields Cleanup Alternatives (ABCA)/FDEP Approved Remedial Action Plan (RAP).** \$20,000 is budgeted in this category for the completion of an EPA Analysis of Brownfields Cleanup Alternatives (ABCA) and the completion of a FDEP Remedial Action Plan (RAP) under the Florida Brownfields Cleanup Criteria rule, Chapter 62-785, Florida Administrative Code, as amended. In preparation for this application, St. Marks has prepared a draft ABCA outlining the cleanup alternatives for remediating the soil at the subject property to comply with the FDEP SCTLs for Residential Scenario. The RAP will include calculations on the overall extent of the surface soil contamination and calculations on the amount of material that will be removed and replaced.

**TASK 3: Remedial Activities & Confirmatory Sampling.** \$160,000 is budgeted in this category for remedial activities and confirmatory sampling in accordance with the Florida Brownfields Cleanup Criteria Rule, Chapter 62-785, Florida Administrative Code, as amended. Additional budget reserved under this task for preparation and recording of the necessary institutional and engineering controls.

**TASK 4: Programmatic Support, Community Relations Plan & Outreach; Travel.** \$16,500 has been budgeted for programmatic support to include assistance completing EPA quarterly reports, MBE/WBE forms, EPA property profile form, EPA work plan and other activities necessary to maintain compliance with EPA cooperative agreement terms and conditions. Additional tasks under Task 4 include revisions to the community relationship plan developed using the 2009 EPA Brownfields Assessment grant; further strategic partnerships and community involvement; dissemination of information and comments to/from the community and stakeholders regarding the ABCA, as well as to hold up to three (3) community meetings to inform and educate the public concerning the reuse of the site and cleanup strategy, and develop any necessary printed materials for these meetings. Revising the existing CRP will leverage the cleanup grant funds with the previous Assessment grant's CRP. St. Marks made the decision to budget the majority of the funding towards actual remediation and has decided to request a limited budget for travel to conferences or workshops. Travel dollars have been set aside for National Brownfields Conference and Florida Brownfields Conference rather expensing the majority of the grant award directly on the East Parcel to maximize the redevelopment of the site.

**c. Ability to Leverage**

St. Marks has leveraged a number of funding sources in its efforts to revitalize the former St. Marks refinery. The former refinery site was designated a state of Florida brownfield area in 2008 therefore making the site eligible for economic and regulatory incentives offered under the Florida Brownfields Program. Incentives include a job creation bonus for each new job created within a designated brownfield area. This was the first step St. Marks took to position the subject property for redevelopment opportunities. Another leveraging opportunity was the successful submittal and award of an EPA Brownfields Assessment grant in 2009. The 2009 grant has led to several leveraging opportunities. As one of only 10 recipients in 2010 of the RE-Powering America's Land Initiative grant, the City received \$50,000 in technical assistance from the National Renewable Energy Laboratory (NREL) in conjunction with US EPA to support a feasibility study for the application of photo voltaic power generation on the adjacent West Parcel. The results of the study indicated a high potential for an end use as a photovoltaic array. Additionally, the Florida Department of Environmental Protection has contributed significant state funds to address environmental issues at this site. St. Marks has worked very closely with FDEP over the years to address lingering

environmental concerns at the subject property and both entities have an excellent relationship working together towards beneficial reuse of the former St. Marks Refinery. A total of \$222,792.93 back property taxes were paid by the City prior to property transfer. Additional \$2,810 of in kind services were provided by City staff. In total, the City has leveraged \$559,337.23 in funds on the former refinery site, including \$228,871.11 in local funds and \$330,466.12 in federal funds.

Although the small community has no funds of its own to put forward and towards the project, St. Marks will continue to seek additional funding and leveraging opportunities to address the project needs should the proposed remedial strategy exceed the total funds awarded. The remediation and redevelopment of the former refinery is the top priority of the community and St. Marks is 100% dedicated to see the project through to successful redevelopment.

### **3. Community Engagement and Partnerships**

#### **a. Plan for Involving Targeted Community & Stakeholders; Communicating Project Progress**

Unlike many communities which struggle with the stigma of brownfields, St. Marks residents acknowledge their existence and have worked within the community to take a proactive approach to their redevelopment. In fact, redevelopment of its brownfield properties is the highest priority of the St Marks community. St. Marks' leadership has the full support of its citizenry. St. Marks established the Visioning Committee in 2006 to involve its entire community in the redevelopment planning process. A questionnaire revealed the top concerns of residents as (1) the rundown properties in the industrial area and (2) pollution. Acting on community responses from its residents, St. Marks developed its *2008 St. Marks Redevelopment Plan* based upon the efforts and recommendations of the Visioning Committee. The community's small size allowed for this process to be a true collaborative effort between the residents and elected and nonelected officials. The US EPA Brownfields 2009 Assessment Grant Application and subsequent award were a direct result of the City's redevelopment plans. Pursuant to the 2009 EPA Brownfields Assessment award, the City's visioning Committee appointed representatives to the Brownfields Advisory Committee (BAC). The BAC is comprised of a mixture of business owners, residents and community leaders and meets monthly to monitor project accomplishments and activities, provide feedback on planning activities and coordinate community involvement. The BAC has continued to meet and monitor project accomplishments since its founding in 2009. Additionally, the City completed a Community Relations Plan that was reviewed and approved by EPA in the initial phase of its Assessment Grant.

Due to its small size, St. Marks is able to achieve 100% distribution of information to its residents. St. Marks typically mails or hand delivers program announcements and informational materials. Additional community partners assist in providing brochures and posting meeting notices throughout the community. In preparation of this application, the City held a community notification meeting on Wednesday, January 8, 2014 at 6:45 pm at City Hall prior to the City's regular scheduled commission meeting. The City provided notice to the community by advertising the meeting in the *Wakulla News* (published 12/26) and by posting notices in several key locations throughout the community, including City Hall, the post office and several local businesses. Additionally, the City posted the subject site with signage with the time and location of the meeting. The vast majority of the population of St. Marks, speaks English as a first language. Assistance will be available to those with language barriers or other physical disabilities that might otherwise prohibit their involvement in brownfield meetings. Meeting facilities are handicap accessible.

**b. Partnerships with Government Agencies** The City of St. Marks has established partnerships with a variety of local and state agencies to ensure the success of their brownfield efforts.

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**State Environmental Agency.** The Florida Department of Environmental Protection (FDEP) has regulatory jurisdiction. FDEP has been an integral part of the city's Brownfield Program and the City will continue to work extensively with the agency to ensure the appropriate cleanup measures are being achieved. St. Marks is leveraging its EPA grant dollars with state incentives offered through the Florida Brownfields Program and FDEP offices. The City will participate in the FDEP's Voluntary Cleanup Tax Credit Program, Brownfields Building Materials Sales Tax and Brownfields Job Bonus Refund Programs, the Brownfields Loan Guarantee Program and Brownfields Liability Protections (as provided statutorily). These state incentives are intended to encourage redevelopment of environmentally stigmatized properties, make redevelopment feasible, and result in positive financial impact on many redevelopment projects. The City has an established working relationship with the FDEP and will further this relationship through the implementation of this grant.

**Local Health Agency.** The City has partnered with the local Wakulla Health Department to identify possible public health impacts of past contamination. As the City begins the proposed cleanup activities, the health department will provide assistance in ensuring adequate precautions are in place to protect any future human health risk during remediation activities.

**Federal and State Governmental Agencies.** As a small community with limited resources, the City of St. Marks relies upon grant funding to support important programs within its community. The City regularly partners with state and federal agencies in the performance of these grant activities. Should additional resources be required to complete the proposed project, the City will seek assistance from the following state and federal agencies in support of this project: US Depts. of Defense/Office of Economic Adjustment and Transportation; Housing and Urban Development; Economic Development Administration; Enterprise Florida; Florida Department of Environmental Protection; Office of Greenways and Trails; Florida Department of Community Affairs; Community Development Block Grants Administration; Florida Department of Health – Wakulla County Health Department; Department of Emergency Management; State of Florida Office of Economic Opportunity.

**c. Partnerships with Community Organizations.** The City of St. Marks is fortunate to have the dedicated support of community based organizations. The following table summarizes the roles of organizations pledging support for this project. Supporting letters are attached in Appendix C.

<b>Community Based Organization</b>	<b>Contact Person</b>	<b>Support Role Pledged</b>
Pruitt Humphress Powers & Munroe Marketing & Communications, Inc.	Mike Pruitt	Public Outreach & Marketing Identify potential projects Serve on Advisory Boards
First Baptist Church of St. Marks	Jon Kilpatrick	General Support
Florida Brownfields Association	Michael Sznepstaljer	Technical Assistance Public Outreach & Marketing Serve on Advisory Boards
Wakulla County Chamber of Commerce	Tammie Barfield	Outreach and Marketing

#### **4. Project Benefits**

##### **a. Health and/or Welfare and Environment**

The proposed cleanup of the East Parcel of the former St. Marks Refinery will provide environmental, social, and public health benefits through the removal of and proper management of serious contaminants in the environment. It is the final step in removing the City's largest eyesore and greatest impediment to redeveloping the St. Marks community, as directed in the guiding

visionary plan, *Plan St. Marks* in 2007 and the 2008 *St. Mark's Redevelopment Plan*. The property is expected to yield desperately needed employment opportunities in St. Marks.

The eastern parcel is perfectly positioned to be redeveloped as marine sales/service or other marine commercial/industrial end-uses. The access and close proximity to a navigable river with access to the Gulf of Mexico and the soon-to-be enhanced Panama Canal are considerable economic draws for small to medium sized businesses relocating or start-up businesses in need of water access to expand their markets. The successful cleanup/redevelopment of this site will stimulate economic and sustainable redevelopment, increase open space/greenspace, and help to affect environmental justice in an area that has inherited a very negative environmental legacy. St. Marks hopes that the revitalization of the entire site will demonstrate how other blighted properties can be successfully reborn into sustainable, productive developments. This sustainable reuse would provide an estimated 5 permanent full-time jobs in the community.

St. Marks will implement appropriate engineering and institutional controls during cleanup efforts to ensure the protection of its residents, particularly the vulnerable populations and disadvantaged community members living in neighborhoods in close proximity. The property is currently fenced and gated to limit inappropriate site access and reduce further risk to human health. The site will remain restricted to limit direct exposure to the appropriate safe commercial and industrial worker scenarios and protect residents of the community from contaminants during cleanup work conducted on the subject site. Signage will also be used to caution residents. St. Marks will work closely with FDEP to ensure that all appropriate, risk-based standards are applied during cleanup activities. The subject property and adjacent parcels are vacant and industrial in nature with adequate access. It will not be necessary to displace residents during the course of the cleanup activities at the East Parcel. Cleaning up the subject site will prevent future contamination of the surrounding marshlands and waterways. These vital natural resources are at high risk from hazardous substances feared to be in danger of leaking into the regional watershed. Preventing this contamination will ensure that these natural environments are preserved and that the fragile ecosystem is protected from harmful pollution.

**b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

i.) Planning, Policies or Other Tools The City is actively employing policies to foster sustainable redevelopment, such as energy efficiency, construction and demolition recycling and renewable energy. During its current remediation efforts on the subject property's sister site (the western portion of the former refinery property), the City has realized significant benefits from its policy of **recycling materials**, a savings of \$115,238 to the City and 900 tons of waste savings to area landfills. Further, the City is currently pursuing the development of a solar power grid system on the site, a renewable energy source. The City will employ recycling in the proposed project to the greatest extent possible. Additionally, the proposed project will **reuse existing infrastructure** for redevelopment and thereby lower its infrastructure costs.

ii.) Example of Efforts One example of City efforts to integrate livability principles into the revitalization of brownfields is the redevelopment of the Western Parcel of the refinery site as a photovoltaic solar panel grid system. **Enhanced energy efficiency and use of alternative, renewable energy sources** will result from the project. This system is capable of generating a source of renewable, sustainable energy to augment the power supply of the nearby Tallahassee power generating plant, the Sam O. Purdom Plant and to the nearby Progress Energy power grid. The solar panel grid system would operate 24 hours a day, 365 days a year. This reuse would not only provide an estimated 5 permanent full-time jobs in the community, but would also provide a sustainable source of power for residents of the community.



**c. Economic and Community Benefits**

i.) Economic or Other Benefits There are two primary economic benefits to the proposed cleanup and subsequent redevelopment of the subject property; job creation and increased general tax revenues for St. Marks. **Job Creation** - The property is expected to yield desperately needed job opportunities in St. Marks. **Increased Property Tax Revenues** - In addition to the valuable addition of jobs, St. Marks expects that the site will result in a substantial increase to general revenues as favorable leases will be negotiated with potential tenants. As a City owned property, the subject site is currently providing no contribution to the City's already limited revenue stream. The productive reuse and job creation ability of such a large property is significant to the community.

Other non-economic benefits. As a waterfront community, St. Marks has natural beauty to not only preserve, but also enhance. Through recent park development projects and transportation beautification efforts, the City is providing new, attractive recreational and business opportunities for residents and visitors. The City's *Plan St. Marks* document outlines economic development and property development priorities that include the creation of new recreation, greenspace, civic, residential and commercial locations to support tourism associated with the area's rich history and natural beauty. The presence of such a highly visible brownfield property as the former St. Marks Refinery East Parcel severely limits the potential to become a true tourist destination and retirement community and hinders attraction of viable commercial and light industrial end uses. The cleanup and redevelopment of the East Parcel into a sustainable, productive, non-polluting source of employment, energy and tax revenues for the City also creates several non-economic benefits to the community. The undeveloped portions of wetlands surrounding the proposed marine use will provide a significant portion of greenspace that will serve as an ideal environmental buffer within the community and to the St. Marks River.

ii.) Job Creation Potential: The property is expected to yield desperately needed employment opportunities in St. Marks. Unfortunately there are no environmental job training programs or brownfield job training grantees in the immediate local area. However, the City will pursue partnership opportunities with WorkForce Plus ([www.wfplus.org](http://www.wfplus.org)), a regional job training and employment resource serving Wakulla County in order to best link members of the community to potential employment opportunities in brownfields assessment, cleanup, or redevelopment.

**5. Programmatic Capability and Past Performance**

**a. Programmatic Capability** St. Marks has the requisite capacity to administer the requested EPA grant funds. Under the direction of City Manager Zoe Mansfield, the City has successfully administered many previous state and federal awards, including a 2009 EPA Brownfields Assessment Grant which closed out in July 2012. Grants received by St. Marks support important programs and services which the city could not otherwise provide to its community. Because these funds allow the city to leverage its finite resources, the impact of grant funding upon the community is significant, with the process of grants administration and management is a critical and important function. Assisting Ms. Mansfield with the management of EPA Grant funding is Mayor Shields. The audit for FY 2011 indicates St. Marks complied in all material aspects with grant/award requirements. St. Marks fosters exceptional stewardship of the public trust through rigorous adherence to ethical and professional standards associated with grant activities.

As a small city with a staff of just three paid employees, St. Marks lacks the capacity and technical expertise to conduct cleanup activities on its own. To ensure the highest level of technical expertise available, the City has directed that all program activities under the award of this cleanup grant will be performed under the direction of the City's qualified environmental services and engineering



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firm. Ample consideration was given to the pursuit of this grant in the recent selection of City consultants, which were solicited and selected under the provisions of Florida's Competitive Consultants' Negotiations Act (CCNA) in full compliance with 40 CFR Part 30. Professional service firms selected under this publicly bid solicitation were selected in large part by their ability to provide comprehensive services as required to perform the program activities of this grant. The selected firm has successfully served as the consultant to numerous awardees in previous years and served as the City's Assessment grant consultant and has the experience needed to ensure program activities are properly conducted and all performance measures are met.

**b. Audit Findings** The most recently completed audit was conducted in February 2013. The City did have one finding as to "Segregation of Duties." The City has just two employees on staff, with which to split all accounting duties. Despite the inherent challenges of a staff of this size, the City has issued a corrective action plan and has pledged to separate the duties of handling cash, checks, posting receipts and disbursements to address this finding. The City's auditors deemed the City a "low-risk" entity and confirmed that the City has complied in all other material aspects.

**c. Past Performance and Accomplishments**

**i) Currently or Has Ever Received an EPA Brownfields Grant**

1. Compliance with grant requirements St. Marks received an EPA Brownfields Assessment Grant in 2009. As of July 31, 2012 (grant close out date), the City had expended 100% of the original \$400,000 for the Assessment grant award. In June 2013, the City received an EPA Brownfields Cleanup Grant in the amount of \$200,000 for remedial activities on the Western Parcel of the former St Marks Refinery Site. As of November 2013, the City had expended \$6,095.27 of the grant award. These expenses included contractual expenses in the amount of \$5,121.56 and attendance at the New Grantee Conference for travel and expenses totaling \$973.71 (includes hotel costs of \$897.84 and expenses of \$75.87). The FY 2012 audit indicates St. Marks complied in all material aspects with grant/award requirements, demonstrating the City fosters exceptional stewardship of the public trust through rigorous adherence to ethical/professional standards associated with grant activities. St. Marks has successfully managed this and other grant agreements, meeting and complying with reporting requirements, submitting final acceptable technical reports, and reporting on its progress and results under these agreements.

2. Accomplishments. The following is a summary of the City's FY2009 Assessment grant activities, outreach efforts and measurable outputs achieved, as well as a summary of activities conducted in the first quarter of the City's FY2013 Cleanup Grant award.

**Summary of FY 2009 US EPA Brownfields Assessment Grant Award**

Award Announcement - April 2009	Kickoff Meeting - October 7, 2009
Work Plan Submitted - June 16, 2009	ACRES database current as of June 31, 2012
RFQ - August 14, 2009	Grant Close Out - June 31, 2012
Contractor Selected - September 30, 2009	
Quarterly and Close Out Reporting - 12 Reports submitted (Through 8/31/2012)	

**Outreach Efforts**

Public Workshop (CRA)	March 11, 2010
Brownfields Program Brochure Printed & Distributed	October 2010
Presentation at FBA "St. Marks Refinery Hurdles"	November 11, 2010
Article Published at FBA "St. Marks Refinery - Small Town, Big Problem"	November 11, 2010

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Public Meeting (at City Hall)	November 18, 2010
Wakulla News Article “St. Marks Refinery - Tank Demo”	November 26, 2010
Wakulla News Article “St. Marks Refinery - Redevelopment Plans”	February 10, 2011
Public Meeting Cleanup Grant and Draft ABCA	October 11, 2012

**Measurable Outputs**

# of Phase I assessments completed	5	# of Phase II assessments completed	3
# of QAPPs completed	2	# of ABCAs completed	1
# of reuse feasibility plans completed	1	# of sites cleaned up/remediated	2

**Expenditures to Date**

<b>Expense</b>	<b>Total</b>
City Expenses and Outside Council	\$13,600.00
Public Involvement	\$15,000.00
Programmatic Support	\$46,000.00
Data Sources, Maps & Inventory	\$15,000.00
Phase 1 ESA's (5@\$4000)	\$20,000.00
Generic QAPP	\$4,850.00
Asbestos Survey	\$4,900.00
Former St. Marks Refinery Site	\$280,650.00
<b>TOTAL EXPENDITURES</b>	<b>\$400,000</b>

**Summary of FY 2013 US EPA Brownfields Cleanup Grant Award – Western Parcel - \$200,000**

Total Grant Amount: \$ 200,000

Total Expenditures to Date: \$ 6,095.27

- Contractual expenses in the amount of \$5,121.56
- Attendance at the New Grantee Conference - travel and expenses totaling \$973.71 (includes hotel costs of \$897.84 and expenses of \$75.87).

**Grant Activities to Date:**

- Attended the New Grantee Workshop on September 4<sup>th</sup> and 5<sup>th</sup>, 2013 held in Atlanta, Georgia.
- City of St. Marks & Cardno met with EPA Project Officer and FDEP on August 22<sup>nd</sup> onsite to discuss redevelopment plans.
- A request for bids was submitted for providing an updated survey at the Former St. Marks Refinery.
- Site surveyor, Wade Brown selected to provide surveying services; pre-excavation survey to be completed by January 6, 2014.

**TABLE OF APPENDICES**

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- B      LETTER OF SUPPORT – STATE ENVIRONMENTAL AUTHORITY**
- C      LETTERS OF SUPPORT – COMMUNITY BASED ORGANIZATIONS**
- D      COMMUNITY NOTIFICATION**
  - PUBLIC COMMENTS RECEIVED & CITY RESPONSES**
  - SUMMARY OF MEETING**
- E      ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)**
- F      COST-SHARE HARDSHIP WAIVER**
- G      SPECIAL CONSIDERATIONS**

**APPENDIX A**  
**THRESHOLD CRITERIA**

## Appendix A - THRESHOLD CRITERIA

### 1. Applicant Eligibility

a. Eligible Entity – The City of St. Marks, is eligible to apply for the EPA Brownfields Assessment Grant because it is a local unit of government under 40 CFR Part 31.3.

b. Site Ownership – The City of St. Marks affirms that it is the sole owner of the subject property.

2. Letter from the State or Tribal Environmental Authority – See Appendix B.

### 3. Site Eligibility and Property Ownership Eligibility

#### Site Eligibility

a. Basic Site Information. (a) Name – Former St. Marks Refinery; (b) Address – 627 Port Leon Drive, St. Marks, FL 32355; (c) Current Owner - City of St. Marks; and (d) Date to Acquire - Not applicable, the City owns the site, acquired on March 5, 2010.

b. Status and History of Contamination at the Site. (a) The subject site is primarily contaminated by hazardous substances, with some comingled petroleum products; (b) The subject property was purchased by Seminole Asphalt Refining LTD in 1954. It operated as a portion of the St. Marks Refinery for 47 years, from 1954 until closed in 2001. During that time, the facility consisted of crude oil and refined product storage areas, two refinery areas, a waste asphalt pond, a linear series of waste ponds and miscellaneous refinery equipment. The refinery produced asphalt, and jet and diesel fuels. Since it closed in 2001, the property has been primarily vacant. Since the City acquired the property on March 5, 2010, the eastern portion of the property has been vacant. (c) Previous assessment work has indicated that soil, sediment, ground water and surface water have all been impacted. The primary contaminants of concern include dioxins, metals, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi volatile organic compounds; (d) The subject site became contaminated through historical use as the state's only refinery. Built in 1954, the refinery processed crude oil for jet fuel and asphalt, and manufactured specialty chemicals until it closed in 2001 after 47 years of operation. The site has been the subject of various assessment efforts. The most recent assessment, performed in 2012 during tank demolition and recycling activities, revealed soil, sediment and ground water have all been impacted. The primary contaminants of concern include dioxins, metals, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and semi volatile organic compounds.

c. Sites Ineligible for Funding. The City affirms that the site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the United States government.

d. Sites Requiring a Property-Specific Determination. Not applicable. The subject site does not require a property-specific determination in order to be eligible for funding.

e. Environmental Assessment Required for Cleanup Proposals. A written ASTM E1903-11 equivalent

## Appendix A - THRESHOLD CRITERIA

Phase II site assessment report was completed for the entire subject property in March 2005 by Earth Tech, Inc. CardnoTBE conducted a Phase II assessment and tank removal activities on the subject site on behalf of the City of St. Marks in 2010 and again in 2012 during the final phase of tank demolition and recycling which occurred on the western portion of the site. Funding was provided through the City's 2009 EPA Brownfields Assessment grant.

### Property Ownership Eligibility

a. **CERCLA §107 Liability.** The City affirms that it is not potentially liable for contamination at the site under CERCLA §107. The City is eligible for CERCLA liability protections or defenses as a bona fide prospective purchaser, having met the All Appropriate Inquiry rule prior to acquisition.

b. **Enforcement or Other Actions.** There are no known ongoing or anticipated environmental enforcement or other actions related to the subject site. The City is not aware of any inquiries or orders from federal, state, or local government entities on the subject property.

### c. Information on Liability and Defenses/Protections.

i) **Information on the Property Acquisition.** The City of St. Marks acquired the subject property, an 8 acre parcel that represents the eastern portion of a 55 acre site, from St. Marks Refinery Inc. on March 5, 2010 through Quit Claim Deed, as a result of foreclosure of real property taxes. The City is the sole owner of the subject property and holds fee simple ownership and affirms that it has no familial, contractual, corporate, or financial relationships/affiliations with prior owners, operators or other parties potentially responsible for the contamination of the property.

ii) **Timing and/or Contribution Toward Hazardous Substances Disposal.** Disposal of hazardous substances at the site occurred before the City acquired the property. The City neither caused nor contributed to any release of hazardous substances at the site. The City further affirms that it has not, at any time, transported hazardous substances to the site.

### iii) Pre-Purchase Inquiry.

**Types of Assessments Performed.** The following is a summary of the assessments and remedial activities that have been conducted on the subject property:

1. Ecology & Environment, Inc. (E&E) performed sampling activities, collecting soil, sediment and groundwater samples for the Florida Department of Environmental Protection (FDEP), October 2000 – June 2002.
2. Handex conducted investigative and remedial work on the subject property on behalf of FDEP, which included Membrane Interface Probe technology, cone penetrometer and fuel fluorescence detector technologies – Summer 2002.
3. Shaw Environmental performed four phases of site assessment work at the site on behalf of FDEP in the late summer and early fall of 2002. Temporary monitoring wells were installed and groundwater samples collected and part of phases II through IV of this assessment.
4. Handex excavated TPH impacted soils from the south central part of the dock area and disposed of 8,464.5 tons of impacted soils under the direction of the FDEP in the summer of 2004.
5. Earth Tech, Inc. conducted an environmental site assessment under the direction of FDEP in

**Appendix A - THRESHOLD CRITERIA**

2005.

6. Earth Tech, Inc. completed a Remediation Action Summary under the direction of FDEP in July 2006.
7. TN & Associates – Oneida Total Integrated Enterprises (TN&A-OTIE) performed Phase I Environmental Site Assessment in compliance with ASTM E1527-05 for the FDEP and EPA in August 2009.
8. Cardno TBE conducted a Phase II ESA and tank removal activities on the subject site on behalf of the City of St. Marks in 2010 and again in 2012. In 2012 the remaining six (6) ASTs were removed and recycled allowing for completion of the initial Phase II ESA.

**AAI Investigation.** TN & Associates – Oneida Total Integrated Enterprises (TN&A-OTIE) performed a Phase I environmental site assessment on the subject property in August 2009 for the FDEP and EPA. The ESA was performed in conformance with ASTM Designation E 1527-05 and the All Appropriate Inquiry (AAI) rule (USEPA 2005). The assessment was performed by L.F. von Oldenberg, a Sr. Chemist at TN&A-OTIE with more than 15 years of experience in all aspects of environmental consulting, investigations and analyses. He has managed and led the investigations for commercial, federal, and public utility programs in the southeast region. His technical experience includes project coordination, Phase I and Phase II site investigations for hazardous and non-hazardous sites, remediation alternatives, emergency response situations, health and safety management, wetlands investigations, asbestos inspections, permitting, and NEPA review and documentation, as well as performing sound surveys. Assisting Mr. von Oldenburg, was Mr. Leland J. Meadows, a Sr. Chemist at TN&A-OTIE with a Bachelor's Degree in Chemistry and more than 8 years of experience in conduction geological and environmental studies. He has performed numerous environmental investigations undertaken to address soil and groundwater contamination from leaking underground tanks, spills, industrial activity, acid mine drainage, and other sources of contamination. He has performed assessments, investigations and remedial activities for residential, commercial, industrial and government properties.

**Timing of AAI Investigation.** The original AAI investigation or Phase I environmental site assessment was conducted within 180 days of the date the City acquired the property.

**iv) Post-Acquisition Uses.** The City acquired the property on March 5, 2010. The property has been vacant since the City took ownership and for several years prior to acquisition. The primary activity on the site has been assessment and tank removal activities performed by City environmental contractor. Since the City acquired the property on March 5, 2010, the eastern portion of the property has been vacant.

**v) Continuing Obligations.** The City has made every effort to take appropriate care with respect to hazardous substances found at the site. The City has fenced and gated the entire site in order to limit public access to the property during its remediation efforts. The City has been closely coordinating assessment and tank removal efforts on the site with the FDEP and intends to enter the site into a voluntary Brownfield Site Rehabilitation Agreement (BSRA). In order to prevent/limit any further exposure of previously released hazardous substances, the City will work expeditiously to remove contaminants through a state approved cleanup plan once awarded. The City affirms its commitment



## Appendix A - THRESHOLD CRITERIA

to continue to comply with land-use restrictions and institutional controls; assist and cooperate and provide access to the property to those performing the cleanup; to comply with all information requests and administrative subpoenas; and to provide all legally required notices.

**d. Petroleum Sites.** Not applicable – the subject property is not a petroleum-contaminated site. The property has been reviewed by the EPA Project Officer and determined to be predominantly impacted by hazardous substances and assessment dollars were expended appropriately.

### 4. Cleanup Authority and Oversight Structure

**a. Oversight.** The City intends to enter the subject site into a voluntary BSRA under the Florida Brownfields Redevelopment Act, Chapter 376.77-376.85, Florida Statutes with the FDEP. This voluntary agreement provides the framework and schedule for remaining remediation activities including confirmatory sampling. The site will be remediated under authority of Chapter 62-785, Florida Administrative Code, Brownfields Cleanup Criteria, as amended. The City does not have staff with the technical expertise to perform the required cleanup activities and has contracted the services of a qualified engineering firm experienced in Brownfields redevelopment to perform services under its existing assessment grant and related future cleanup activities. The selected firm was procured in full compliance with the procurement provisions of 40 CFR 31.36. A detailed scope of work for cleanup activities will be developed based on previous assessment results upon notification of award of this grant.

The City developed a Generic Quality Assurance Project Plan in 2009 and will develop a Site-Specific Quality Assurance Project Plan as required by EPA Region IV prior to initiating any confirmatory sampling activities on the site. The City will provide general project oversight and environmental coordination through its qualified environmental engineering firm. The City's Brownfields Advisory Board will be identified in the BSRA and will provide overall project review and enhanced public involvement associated with the project. FDEP will provide technical review of all assessment and remedial documents. The City's brownfields program has been engaged in this project from its inception and will continue to provide project support and coordinate review of documents through the Brownfields Advisory Board.

**b. Impact to adjacent or neighboring properties.** The City will continue to work closely with the community to develop a site access plan to minimize inconvenience to neighboring residents and businesses. The City will continue to hold information meetings for surrounding businesses and residents prior to commencement of cleanup activities in order to receive input on site access issues and to receive recommendations on this topic. The subject property is located on the only major thoroughfare to downtown with a number of opportunities for site access and it is not anticipated that remedial activities or installation of remediation equipment will cause disruptions of business or lack of access to adjacent residential properties. Site access from adjacent property owners is not anticipated. If necessary, the City will enter into site access agreements outlining locations of equipment and remedial activities and conditions agreeable to adjacent property owners. An OSHA health and safety plan will be developed to insure that potential health and safety issues will be addressed for workers under OSHA 1910.120 and the surrounding community.

## **Appendix A - THRESHOLD CRITERIA**

### **5. Cost Share**

i) The City is requesting \$200,000 in Cleanup funds for the subject property. The City lacks the financial resources to provide a match and is requesting a hardship waiver. See Appendix F.

ii) **Hardship Waiver** – See Appendix F.

**6. Community Notification** The City of St. Marks understands that community engagement is the cornerstone of the Brownfields Program and in ensuring successful cleanup and redevelopment of brownfields projects. The City developed a Community Relations Plan in the initial phase of its Assessment Grant award. The City held a public meeting to provide the community with notice of its intent to apply for this EPA brownfields grant and allow the community an opportunity to comment on the draft proposal on January 8, 2014 at 6:30 pm at City Hall. A newspaper advertisement was published in the Wakulla News on December 26, 2013. Additional notices advising the public of the meeting and soliciting comments on the draft proposal were posted throughout the community. The public notices and newspaper advertisement clearly indicated that a copy of the draft proposal was available for public review at City Hall. Copies of the proposal were made available at City Hall and at the public meeting for public comment from December 26, 2013 through January 16, 2014. The draft proposals included, as an attachment, a draft analysis of brownfield cleanup alternatives (ABCA) which summarized information about the site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. The draft ABCA also included information on the effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered, including the one chosen. A copy of the ABCA is contained in Appendix E. Community advertisements, meeting notes, comments and responses are provided as Appendix D.

**APPENDIX B**

**LETTER OF SUPPORT – STATE ENVIRONMENTAL AUTHORITY**



# Florida Department of Environmental Protection

Northwest District  
160 W. Government Street, Suite 308  
Pensacola, Florida 32502-5740

Rick Scott  
Governor

Herschel T. Vinyard Jr.  
Secretary

January 10, 2014

Ms. Cindy J. Nolan  
Brownfields Program  
U.S. Environmental Protection Agency  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

Dear Ms. Nolan:

The Florida Department of Environmental Protection (Department) acknowledges and supports the City of St. Mark's application for a Brownfields Hazardous Substance Cleanup grant. The Department understands that the application has been prepared in accordance with EPA's guidance document EPA-OSWER-OBLR-13-07, titled "Guidelines for Brownfields Cleanup Grants". This letter of acknowledgement addresses the requirement for a "Letter from the State or Tribal Environmental Authority", described in SECTION III.C.2. EPA Brownfields grant funding will strengthen cleanup and redevelopment efforts in the City of St. Marks. This federal grant effort also supports Florida's Brownfields Redevelopment Act and the Department's role in administration of site rehabilitation of contaminated sites.

The Department encourages EPA grant recipients to use the incentives and resources available through Florida's Brownfields Redevelopment Program with EPA grant funding to enhance the success of their brownfields project. The Department recommends that the City of St. Marks contact Sally Cooley, P.G., Northwest District Brownfields Coordinator, at 850-595-0558, to learn more about the Florida Brownfields Redevelopment Program.

Sincerely,

Emile D. Hamilton  
District Director

EDH/sc/r

c: Chuck Shields, Mayor, City of St. Marks, P.O. Box 296, St. Marks, 32355  
Zoe Mansfield, City Manager, [cityofstmarks@comcast.com](mailto:cityofstmarks@comcast.com)  
Leslie Sykes, Grants Service Manager, Cardno TBE, [Leslie.Sykes@cardno.com](mailto:Leslie.Sykes@cardno.com)  
Tracy Berg, CardnoTBE, [Tracy.Berg@cardno.com](mailto:Tracy.Berg@cardno.com)  
Margaret Olsen, EPA Region 4 Florida Grants Coordinator, [Olsen.Margaret@epa.gov](mailto:Olsen.Margaret@epa.gov)  
Kim Walker, FDEP Brownfields Liaison, [kim.walker@dep.state.fl.us](mailto:kim.walker@dep.state.fl.us)  
Sally Cooley, FDEP Brownfields Coordinator, [sally.cooley@dep.state.fl.us](mailto:sally.cooley@dep.state.fl.us)

**APPENDIX C**

**LETTER OF SUPPORT – COMMUNITY BASED ORGANIZATIONS**



**BOARD OF DIRECTORS**

**Michael Sznajstajler**  
President, FBA  
*Cobb Cole*

**Nadia Locke**  
President-Elect  
*E-Sciences, Inc.*

**Ed Johnson**  
Treasurer  
*City of Tampa*

**David Latham**  
Secretary  
*Geosyntec Consultants*

**Michael Goldstein**  
*The Goldstein*  
*Environmental Law Firm,*  
*P.A.*

**Laurel Lockett**  
*Carlton Fields, P.A.*

**Janet Peterson**  
*Bureau Veritas North*  
*America, Inc.*

**F. Joseph Ullo, Jr.**  
*Lewis, Longman & Walker,*  
*P.A.*

**Greg Vaday**  
*Treasure Coast Regional*  
*Planning Council*

**John Titkanich, Jr.**  
Past-President, FBA  
*City of Cocoa*

December 27, 2013

The Honorable Chuck Shields  
City of St. Marks  
P.O. Box 296  
St. Marks, FL 32355

Dear Mayor Shields:

On behalf of the Florida Brownfields Association ("FBA") please accept this letter of support for the City of St. Marks' submittal of a Brownfields Cleanup Grant application to the United States Environmental Protection Agency ("EPA") for the property located at 627 Port Leon Drive.

The FBA is a non-profit, volunteer, service organization dedicated to advancing the cleanup and redevelopment of Brownfields in Florida. Brownfields are sites for which their expansion, redevelopment, or reuse may be complicated by actual or perceived contamination. Working in cooperation with the Florida Department of Environmental Protection and the EPA, the FBA is a group of environmental stakeholders and professionals who provide information, assistance, and redevelopment strategies regarding Brownfields to communities and the public in the interest of cleaning up and redeveloping contaminated properties and revitalizing areas.

We applaud the City of St. Marks' efforts in seeking revitalization and redevelopment in the State of Florida and hope you will give every possible consideration to its application for an EPA Cleanup Grant. We look forward to assisting the City of St. Marks upon its successful grant award. The FBA through its membership will provide technical assistance to the City of St. Marks, and will assist with public outreach and marketing by participating in public meetings or assisting with educational presentations. Further, our membership is willing to serve on advisory boards or committees that are developed in support of this grant.

Should you have any questions or concerns regarding the FBA's support of the City of St. Marks' Brownfields Cleanup Grant proposal, please do not hesitate to contact me at (386) 323-9222 or [Michael.Sznajstajler@cobbcole.com](mailto:Michael.Sznajstajler@cobbcole.com).

Regards,

  
Michael Sznajstajler, Esquire  
President

cc: Ms. Leslie Sykes



Date: October 29, 2013

Zoe Mansfield  
City Manager  
City of St. Marks  
PO Box 296  
St. Marks FL 32355

Dear Ms. Mansfield:

On behalf of Pruitt Humphress Powers & Munroe Marketing & Communications, Inc., please accept this letter of commitment to and support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive. . The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of our community.

We are an industrial marketing and communications company, writing technical copy, creating national ads, sales literature and research for the clients we serve.

In support of and commitment to the City of St. Marks Brownfield Program, Pruitt Humphress Powers & Munroe will work with the City of St. Marks to endeavor through our marketing and communications skills to provide assistance in meeting the needs of this EPA Brownfields Cleanup Grant in any way we can (through writing, graphics) and any need we are able to fulfill. Further, Pruitt Humphress Powers & Munroe is willing to serve on advisory boards or committees that are developed in support of this grant and brownfields redevelopment in our community.

Please feel free to contact Pruitt Humphress Powers & Munroe so that we may demonstrate further support of this US EPA Brownfields Assessment grant application.

Affiliates in: Sincerely,

*London, England*

*Düsseldorf, Germany*

*Milan, Italy*

*Newcastle, Australia*

*Medellin, Columbia*

*Rio de Janeiro, Brazil*

*Mexico City, Mexico*

*Copenhagen, Denmark*

*Port Elizabeth, South Africa*

*Hong Kong, China*

**PRUITT HUMPHRESS POWERS & MUNROE  
MARKETING & COMMUNICATIONS, INC.  
Mike Pruitt  
President**

**Strategic Direction On A Global Scale™**



# ST. MARKS FIRST BAPTIST CHURCH

14 Shell Island Road  
PO Box 145  
St. Marks, FL 32355  
Jonathan Kilpatrick, Pastor

November 3, 2013

Ms. Zoe Mansfield, City Manager  
City of St. Marks  
PO Box 296  
St. Marks, FL 32355

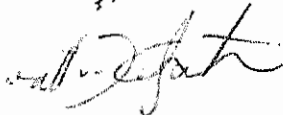
Dear Ms. Mansfield:

On behalf of the St. Marks First Baptist Church, please accept this letter of commitment to and support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive. The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of our community.

We at St. Marks First Baptist Church strive to serve Jesus Christ and honor Him through service to others. In support of and commitment to the City of St. Marks Brownfield Program, the St. Marks First Baptist Church will provide assistance with public outreach and marketing through our meetings and our membership will attempt to identify potential redevelopment projects.

Further, members of the St. Marks First Baptist Church can be available to serve on advisory boards or committees that are developed in support of this grant and brownfields redevelopment in our community.

Sincerely,



Jon Kilpatrick, Pastor  
St. Marks First Baptist Church

## SERVICE TIMES

Sunday School Fellowship  
Sunday School  
Morning Worship

9:15AM  
9:30AM  
10:30AM

<u>Wednesday</u>	
Fellowship Dinner	6:00PM
Bible Study & Prayer	7:00PM

# WAKULLA COUNTY CHAMBER OF COMMERCE

---

P.O. Box 598, Crawfordville, Florida 32326  
Telephone: (850) 926-1848 Facsimile: (850) 926-2050

Friday, November 1, 2013

Zoe Mansfield  
City Manager  
City of St. Marks  
PO Box 296  
St. Marks FL 32355

Dear Ms. Mansfield:

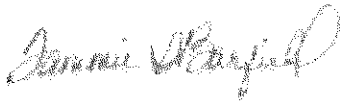
On behalf of WAKULLA COUNTY CHAMBER OF COMMERCE, please accept this letter of support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive. The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of our community.

Besides facilitating and building relationships amongst business owners, the chamber promotes advancement of civic and commercial interests, economic programs, sustainable growth and development. The Wakulla County Chamber of Commerce, through our 2010 priorities, will be looking to partnerships such as this to increase and educate both residents of Wakulla County, as well as the surrounding counties. Brownfields redevelopment will foster increased business opportunities, and the economic growth for our local businesses and workforce will revitalize local communities that are suffering from today's economy.

In support of and commitment to the City of St. Marks Brownfield Program, the WAKULLA COUNTY CHAMBER OF COMMERCE will provide assistance with public outreach and marketing through our meetings and membership.

Please feel free to contact me so that we may demonstrate further support of this US EPA Brownfields Assessment grant application.

Sincerely,



TAMMIE BARFIELD, PRESIDENT  
WAKULLA CHAMBER OF COMMERCE  
(850) 926-1848



PANACEA WATERFRONTS FLORIDA PARTNERSHIP, INC.  
P. O. BOX 212  
PANACEA, FLORIDA 32346

January 16, 2014

Ms. Zoe Mansfield  
City Manager  
City of St. Marks  
P O Box 296  
St. Marks, FL 32355

Dear Ms. Mansfield:

On behalf of Panacea Waterfronts Florida Partnership, please accept this letter of support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive.

The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of the community.

In support of and commitment to the City of St. Marks Brownfield Program, Panacea Waterfronts Florida Partnership will provide assistance with public outreach and marketing through our meetings and membership.

Sincerely,

A handwritten signature in black ink that reads "Walt Dickson". The signature is fluid and cursive, with the first name "Walt" being more prominent than the last name "Dickson".

Walt Dickson  
President  
Panacea Waterfronts Florida Partnership, Inc.  
P.O. Box 212  
Panacea, FL 32346



St. Marks Stone Crab Festival • P.O. Box 273 • St. Marks, FL 32355

Date: January 20, 2014

Zoe Mansfield  
City Manager  
City of St. Marks  
PO Box 296  
St. Marks FL 32355

Dear Ms. Mansfield:

On behalf of the St. Marks Stone Crab Festival Committee, please accept this letter of commitment and support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive. . The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We support the cities' revitalization and re-development of our community.

Our Committee efforts include economic revitalization of our community through the efforts of our Annual Stone Crab Festival; plus support of our St. Marks Volunteer Fire Department and Waterfront Florida Partnership in the revitalization of coastal shoreline through an environmental friendly way.

In support of and commitment to the City of St. Marks Brownfield Program, the St. Marks Stone Crab Festival Committee will work with the City of St. Marks to support any way we can the effort to provide assistance in meeting the needs of this EPA Brownfields Cleanup Grant. Further, this committee (several members) will be willing to serve on advisory boards or committees that are developed in support of this grant and brownfields redevelopment in our community.

Please feel free to contact Mike Pruitt, Chairman, so that we may demonstrate further support of this US EPA Brownfields Assessment grant application.

Sincerely,

Mike Pruitt

ST. MARKS STONE CRAB FESTIVAL COMMITTEE  
Mike Pruitt  
Chairman



**WAKULLA COUNTY TOURIST DEVELOPMENT COUNCIL**

P. O. Box 67  
Panacea, Florida 32346  
(850)984-3966/(850)926-5770 fax

January 13, 2014

Ms. Zoe Mansfield  
City Manager  
City of St. Marks  
PO Box 296  
St. Marks, FL. 32355

Dear Ms. Mansfield:

On behalf of the Wakulla County Tourist Development Council, please accept this letter of support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive.

The award of a Cleanup grant will leverage the City's successes of the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of the community.

In support of and commitment to the City of St. Marks Brownfield Program, the Wakulla County Tourist Development Council will provide assistance with public outreach and marketing through our meetings and membership.

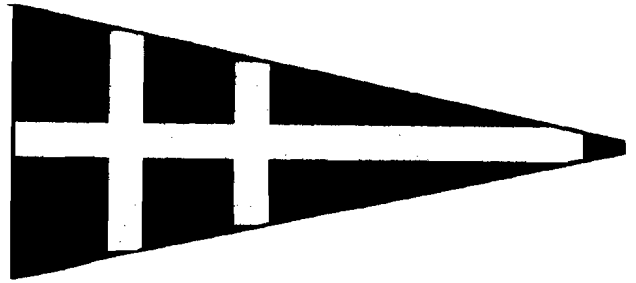
Sincerely,

David Moody  
Chairman,  
Wakulla County Tourist  
Development Council

# **St. Marks Yacht Club, Inc.**

**PO Box 116**

**St. Marks FL 32355-0116**



January 21, 2014

Zoe A. Mansfield- St. Marks City Manager

PO Box 296

St. Marks, FL 32355-0296

Dear Zoe,

On behalf of the St. Marks Yacht Club, please accept this letter of commitment and support for the City of St. Marks application for 2014 Brownsfield Cleanup Grant. The award of the Cleanup Grant will further the efforts of the city to complete the revitalization of the old Refinery Property. We applaud the efforts of the City to support the revitalization and redevelopment of our community.

The St. Marks Yacht Club through its members has been very active in the success and revitalization of our wonderful community. In support of the St. Marks Brownfield Program SMYC will provide assistance with public outreach and marketing through our meetings and members.

Please feel free to contact SMYC so we may demonstrate further support for this Brownsfield Grant.

Sincerely,

A handwritten signature in black ink, appearing to read 'Billy Bishop'. The signature is fluid and cursive, with a long, sweeping underline.

Billy Bishop

Commodore

St. Marks Yacht Club



**BOARD OF  
COUNTY COMMISSIONERS**

**Richard Harden**  
Chairman, District 5

**Ralph Thomas**  
Vice-Chairman, District 1

**Randy Merritt**  
District 2

**Howard Kessler, M.D.**  
District 3

**Jerry Moore**  
District 4

**J. David Edwards**  
County Administrator

**Heather J. Encinosa**  
County Attorney  
(850) 224-4070

January 21, 2014

Zoe Mansfield  
City Manager  
City of St. Marks  
PO Box 296  
St. Marks FL 32355

Dear Ms. Mansfield:

On behalf of the Wakulla County Board of County Commissioners, please accept this letter of commitment and support for the City of St. Marks application for a 2014 EPA Brownfields Cleanup Grant for the property located at 627 Port Leon Drive. The award of a Cleanup grant will leverage the City's successes of the last three (3) years with the original EPA Assessment grant to promote further revitalization of the former St. Marks Refinery site. We applaud the City's effort to support the revitalization and redevelopment of our community.

As one of two municipalities in our county, and as a historic economic center for the region, this grant can allow St. Marks to continue to rebuild, and to help revitalize its local economy. St. Mark's success is a success for a community as a whole. We fully support their effort to secure this funding and make improvements to this Brownfield.

Wakulla County will continue to work with the City of St. Marks to ensure the success of this outreach, doing whatever we can to assist them as they move forward. Wakulla County will be glad to serve on advisory boards or committees that are developed in support of this grant and Brownfields redevelopment in our community.

Please feel free to contact Sheree Keeler at 850-926-0919, or [SKeeler@mywakulla.com](mailto:SKeeler@mywakulla.com) so that we may demonstrate further support of this US EPA Brownfields Assessment grant application.

Sincerely,

Richard Harden, Chairman

Administration Office  
Post Office Box 1263  
Crawfordville, FL 32326  
(850) 926-0919  
(850) 926-0940 FAX



**APPENDIX D**  
**COMMUNITY MEETING DOCUMENTATION**



## **PUBLIC MEETING**

The City of St. Marks plans to apply for an Environmental Protection Agency (EPA) Brownfields Cleanup grant for \$200,000 to assist with remediation efforts at the former St. Marks Refinery site, specifically the Eastern Parcel along the riverfront of the St. Marks River. The subject site's Western Parcel received a cleanup grant in 2013. The Eastern Parcel comprises approximately 7 acres, more or less. The City will hold a public meeting/workshop to enable citizens to review the Grant application/proposal and a draft Analysis of Brownfields Cleanup Alternatives (ABCA) and offer time for questions and comments from individual attending the meeting. The meeting will be held at City Hall, 788 Port Leon Drive, City of St. Marks, Florida commencing at 6:30 pm on January 8, 2014. Alternatively if you are unable to attend the meeting, inquiries and comments can be submitted electronically by addressing an email to the City's Brownfield Consultant at [Roger.Register@Cardno.com](mailto:Roger.Register@Cardno.com). Place in the Subject Line "St. Marks EPA 2014 Cleanup Grant". Emails must be received by January 16, 2014. Paper copies of the application will be available at the public meeting/workshop or can be obtained in electronic format by emailing a request to the above referenced email address.

*City Hall is located at 788 Port Leon Drive is open 9 a.m. until 4:30 p.m., Monday through Friday. The phone number is 850.925.6224. Persons needing special access considerations should call City Hall at least 24 hours before the scheduled workshop.*

DECEMBER 26, 2013

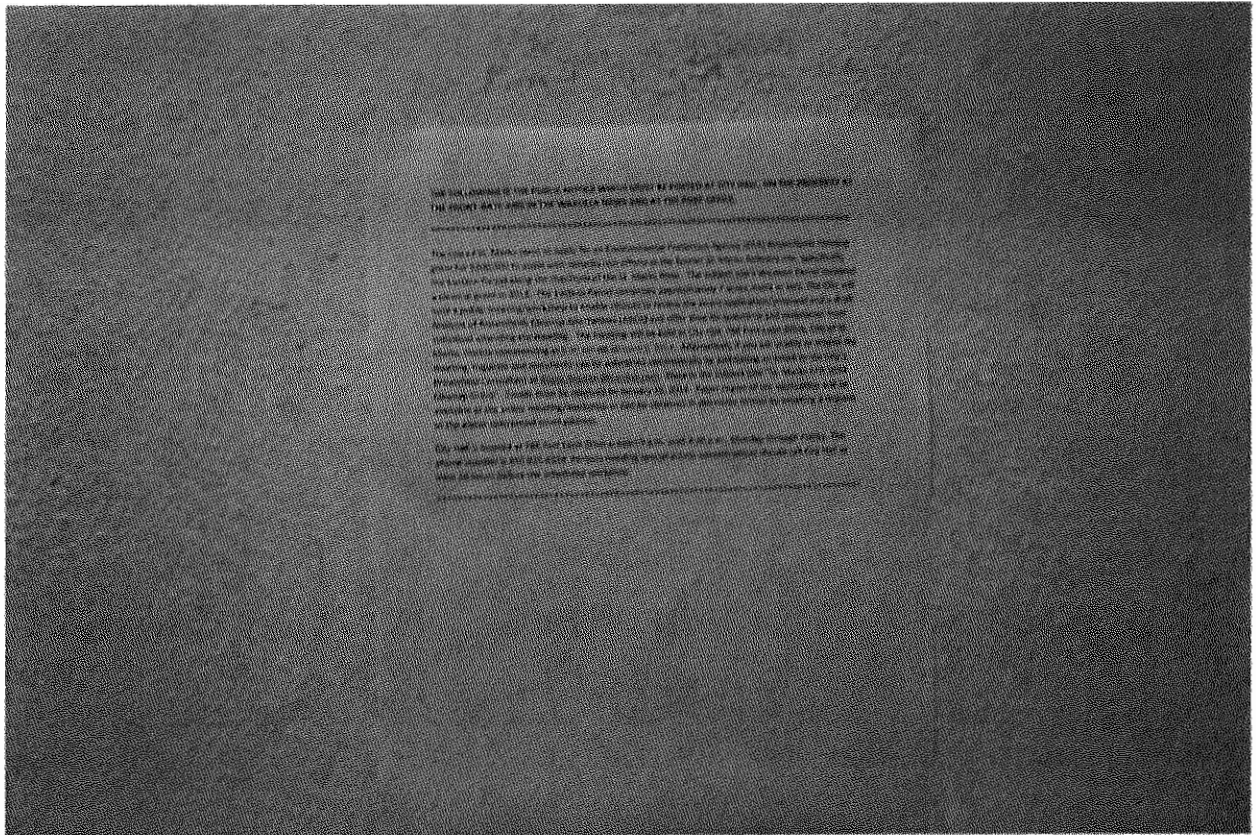
**THE FOLLOWING IS THE PUBLIC NOTICE WHICH MUST BE POSTED AT CITY HALL, ON THE PROPERTY AT THE FRONT GATE AND IN THE WAKULLA NEWS AND AT THE POST OFFICE.**

\*\*\*\*\*

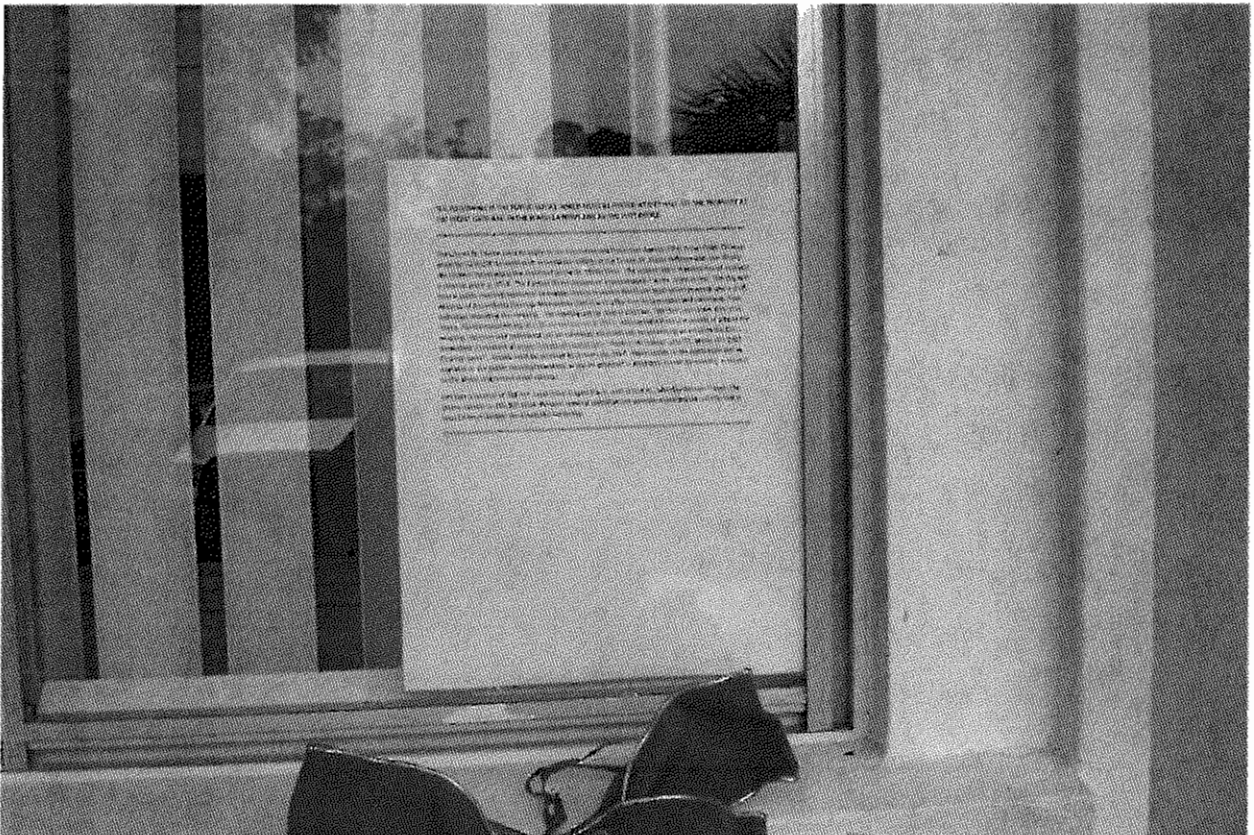
The City of St. Marks plans to apply for an Environmental Protection Agency (EPA) Brownfields Cleanup grant for \$200,000 to assist with remediation efforts at the former St. Marks Refinery site, specifically the Eastern Parcel along the riverfront of the St. Marks River. The subject site's Western Parcel received a cleanup grant in 2013. The Eastern Parcel comprises approximately 7 acres, more or less. The City will hold a public meeting/workshop to enable citizens to review the Grant application/proposal and a draft Analysis of Brownfields Cleanup Alternatives (ABCA) and offer time for questions and comments from individual attending the meeting. The meeting will be held at City Hall, 788 Port Leon Drive, City of St. Marks, Florida commencing at (insert time of meeting here) on (insert date of meeting here). Alternatively if you are unable to attend the meeting, inquiries and comments can be submitted electronically by addressing an email to the City's Brownfield Consultant at [Roger.Register@Cardno.com](mailto:Roger.Register@Cardno.com). Place in the Subject Line "St. Marks EPA 2014 Cleanup Grant". Emails must be received by January 16, 2014. Paper copies of the application will be available at the public meeting/workshop or can be obtained in electronic format by emailing a request to the above referenced email address.

City Hall is located at 788 Port Leon Drive is open 9 a.m. until 4:30 p.m., Monday through Friday. The phone number is 850.925.6224. Persons needing special access considerations should call City Hall at least 24 hours before the scheduled workshop.

\*\*\*\*\*







AGENDA  
EPA Brownsfields Cleanup Grant Workshop  
January 8, 2014  
6:30 PM

Roger Register and Beth Norman-Cardno TBE

AGENDA  
Regular Meeting  
January 8, 2014  
7:00 pm

- I. Call meeting to order
- II. Pledge of Allegiance
- III. Approve minutes of regular meeting 12-12-2013
- IV. Guests:

Billy Bishop-Waterfront Florida Partnership
- V. City Manager Zoe a Mansfield

A. New Business:

Applying for Funds from 2014 Senate District 3 Budget
- VI. Attorney Ron Mowrey
- VII. Commissioners
- VIII. Audience
- IX. Adjourn

Sign In Sheet  
January 8, 2014  
6:30 pm  
EPA 2013 Brownsfields Workshop

Name

Beth Norman beth.norman@cardno.com

Nicholas Ficare nfigate@mowreylaw.com

Joel Mansfield

Mark Mason mmason@mowreylaw.com

Tracy Stott

Charles Rife

Gail Giblin

Phil Carter

Minutes  
EPA Cleanup Grant  
October 11, 2012

Workshop called to order at 6:45 pm.

Roger Register gave a presentation to the board and public on the FY 13 US EPA Brownfields Cleanup Grant.

Motion to adjourn EPA workshop made by Commissioner Gail Gilman.  
Second by Commissioner Allen Hobbs. All in favor.

Adjourned 7:01 pm



## Candidates for property appraiser appear at forum

By JENNIFER JENSEN  
jjensen@hewakullanews.net

The last forum for the property appraiser's race was held on Oct. 25 and the two candidates seemed to agree on a number of issues.

One of the few major disagreements between incumbent Donnie Sparkman and challenger Jim Parham was their estimation of when property values will return to normal.

Parham, who has 38 years experience as an appraiser in the private and public sector, predicted the next major boom in real estate will happen around 2020 when the grandchildren of the baby boomers are moving out of their parent's homes and purchasing

their own.

"Let's be ready for it to do it the right way," Parham said.

Sparkman, who has served as property appraiser for six years and has been a land surveyor and community development director for the county, said 2004-10 was unprecedented and wasn't sure if where the county is right now isn't the normal market now.

Until the market is cleared up and mortgage lenders start lending, there won't be any major changes, he said.

"I don't expect to see a change in my lifetime," he said.

The candidates were asked if they felt there was the perception in the county that there is preferential

**Donnie Sparkman**  
treatment given to the eval-  
uation of certain properties  
in the county.

In order to address this, the office must be more transparent and hold workshops to explain the process to residents, he said. This feeling of distrust is not limited to the property appraiser's office, he added.

the same. He wondered why these people who feel this way weren't calling his office. He added that when someone doesn't understand why their property value might be lower or higher than their neighbors, he sits down and explains it to them.



## St. Marks applies for EPA grant

By JENNIFER JENSEN  
Herisen@bewakullanews.net

The City of St. Marks has begun to take the final steps in cleaning up the old St. Marks refinery property, now known as St. Marks Innovating Park.

The city completed the removal of the 11 tanks and the associated piping racks earlier this year through a brownfield assessment grant from the U.S. Environmental Protection Agency. It now plans to apply for a brownfield cleanup grant for \$200,000 from EPA.

If awarded, this money will be used to remove isolated spots via excavation and an off-site disposal and capping impacted areas to eliminate exposure, said Roger Register, director of Cardno TBE, the city's consultant who conducted the most recent phase of the assessment grant.

It will take about a year and a half to complete, Register said.

Along with the grant, the city is also applying for a hardship waiver of the 20-percent match required.

The deadline to apply is Nov. 19. It will be awarded in April or May of 2013.

Register said the grant is extremely competitive, but St. Marks has a good shot because they were successful with the previous grant.

The St. Marks Refinery produced jet fuel and diesel. Crude oil was delivered by barge and products were shipped out by truck. The site was owned by American International Petroleum Corporation until the firm entered into bankruptcy in 2005. The facility was closed in 2001 and the corporation simply walked away from it.

In 2005, Florida Depart-



*Cleanup of the refinery site to create St. Marks Innovation Park*

processing equipment was and there has been discussion about using it as a solar farm. As for the area closest to the St. Marks River, some have proposed developing it as a boat yard.

In other news:  
A group approached the city about possibly renting the refinery property, closest to the road, to hold a swap meet car show. It would be a three-day event that is held three times a year and features antique vintage cars and motorcycles.

ment of Environmental Protection took over the site and spent \$20 million to remove the processing equipment, excavating and cleaning it up, as well as conducting an assessment.

The 55-acre site was then donated to the city in 2010 through a quit-claim deed.

The city divided the 55-acre site into two parcels, the west consisting of 47 acres fronting Port Leon Drive and 8 acres adjoining the St. Marks River.

The cleanup thus far has focused on the west parcel which contained the 11 storage tanks and two office

Potential uses for the site, include a commercial or industrial park closest to Port Leon Drive. The two buildings on that site have been renovated and the city has had a couple tenants.

The middle part of the site is where the bulk of the

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**NOVEMBER**  
**Bargains**  
**of the month.**

## CITY OF ST. MARKS

# Brownfields grant scored

By AMANDA MAYOR  
amayor@thewakullanews.net

The majority of the St. Marks City Commission meeting on Thursday, Aug. 8 was spent while commission members reviewed the packets of two bidders who were interested in spearheading projects and administration of a grant that the city received through the Environmental Protection Agency's Brownfields Program.

The purpose of the program is to support revitalization efforts by funding environmental assessment, cleanup and job training activities. The city is looking to add to the several revitalization projects that it has accomplished over recent years.

The Brownfields grant is for the old St. Marks Refinery site, which is contaminated.

Through an official evaluation system in which they scored both packets separately on paper, city commissioners unanimously chose Cardno Engineering Company. The next steps for the process will be the city's attendance of an EPA Brownfields grantee workshop on Aug. 22, after which a contract may be formulated.

City Manager Zoe Mansfield also brought the commission's attention the Department of Economic Opportunity Technical Assistance Grant Program that the city had recently received along with the county in the amount of \$35,000.

"What that money will do is help bring down our community rating," said



AMANDA MAYOR

**New streetscaping in front of St. Marks City Hall is part of the city's plan to move away from its industrial past.**

Mansfield. "Right now our city rating is Class A and the county has a rating of seven."

She explained that the desired rating is a six and that, through the grant, improvements will be made possible which will help with flood insurance rates for both the city and residents.

Mansfield also presented three bids submitted for maintenance work to be done on the city's wastewater treatment plant. As requirements by the state would dictate the same level of quality from each bidder, the city voted to go with the low bid, which was about

\$2,000 from McDonald Group International out of Inverness.

Fire Chief Ronnie Day with the St. Marks Volunteer Fire Department reported that they would not be signing the new contract agreement given to them by the county. According to Day too many changes were proposed, including giving overall authority of the city's fire department to the county's fire chief.

"We're volunteers," he said. "We own our own building and equipment and this would give the county full control over all of that."

Day said that the city's

volunteer fire department has been butting heads with the county's fire chief since he was established in his position.

"I just wanted to make you all aware of what was going on and that at this time we are not signing a contract. The level of service that we provide is not going to change."

City Attorney Ron Mowrey advised commission members that he wished to schedule a flood ordinance workshop in the near future, as the ordinance needs to be updated. He also filled in commissioners on his intent to bring back new procedures for citizens to be heard as he said recent laws have been put into place governing requirements relating to the subject.

Billy Bishop briefly updated on Waterfronts' next project, which will be the yacht club's boat parade to be held in December. However, right now most efforts are going towards Stone Crab Festival details. The festival is slated for Oct. 26.

Local citizen Chip Coffin attended Thursday's meeting to offer volunteer work to the city in any way he could.

"I love St. Marks," he said. "I'm not here to fuss or ask you for anything. I'm here to try to offer you something."

Coffin had previously gone around the city at night surveying street lamps and marking the ones that were inoperative. He presented his finding to the commission on Thursday.

"I don't want you to pay for something you're not getting," he said.

## PUBLIC NOTICES

**APPENDIX E**

**ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES**

# Draft Analysis of Brownfields Cleanup Alternatives

Eastern Parcel  
of the  
Former St. Marks Refinery Site  
St. Marks, FL

Prepared to Support EPA Brownfields Site Specific Cleanup Grants

*Prepared for*



*A Waterfronts Florida  
Partnership Community*

*Prepared by*



January 2014

**Approval:**

**Cardno Project Manager:**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name/Date

**Document Quality Assurance/Quality Control Officer:**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name/Date

**U.S. EPA Project Manager:**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name/Date

**City of St. Marks:**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name/Date

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## FIGURES

Figure	Description
1	Site Location
2	Parcel Layout Map

## APPENDIX

A	Site Assessment Report (Phase I ESA), (TNA-Oneida Total Integrated Enterprise)
B	Storage Tank Closure Assessment Report (Cardno TBE)

## **1.0 Introduction and Background**

### **1.1 Introduction**

The City of St. Marks (City) is applying for an Environmental Protection Agency (EPA) Brownfields Cleanup Grant for the former St. Marks Refinery (SMR) site located at 627 Port Leon Drive, St. Marks, FL 32355, acquired the on March 5, 2010. The former site consists of approximately 55 acres and has been divided into two parcels: “Eastern Parcel” and “Western Parcel”. The Eastern Parcel consists of approximately 8 acres of waterfront uplands, former terminal loading dock/pier and adjacent wetlands suitable for redevelopment as marine sales/service or other marine commercial/industrial end-uses. The Western Parcel parcel consists of approximately 47 total acres, 27 of which contain uplands adjacent to SR 363 and stormwater treatment areas suitable for commercial/industrial end-uses. A possible reuse of this portion of the SMR site has been identified for a photovoltaic solar power generation facility or commercial warehousing or office space.

The City was successful in 2013 with an award of a Brownfields Cleanup grant for \$200,000 and a hardship waiver to address the residual soil contamination at the Western Parcel. The City has begun procuring the necessary remediation services to engineer a soil cap and lower the existing weir structure for the Western Parcel. With a successful Cleanup award for the Eastern Parcel the City will commence engineering design of another soil cap and possible sheet piling design along the riverfront to mitigate migration of any impacted groundwater or residual soil contamination from impacting the Florida Outstanding Water Body – the St. Marks River.

The SMR entire site is located within the City’s Community Redevelopment Area (CRA) and has also previously been designated a Brownfields site under the Florida Brownfields Redevelopment Act, Chapter 376.77-376.85 Florida Statutes with Florida Department of Environmental Protection (FDEP). The City has received an EPA Brownfields Assessment Grant in 2009 and a Repowering America’s Lands Grant in 2010 to evaluate the potential feasibility for reuse of this site as a photovoltaic solar power generation facility. The City intends on submitting a Site Specific EPA Brownfields Cleanup Grant, to support the appropriate levels of cleanup to facilitate redevelopment of this site and to leverage the 2013 Brownfields Grant award for the Western Parcel. This Analysis of Brownfields Cleanup Alternatives (ABCA) is being prepared to demonstrate and document to the United States Environmental Protection

Agency (EPA) that the appropriate cleanup methods have been evaluated and will be applied at the former St. Marks Refinery Site, as required by the Grant requirements. Public notice will be given in accordance with the requirements of the Cleanup Grant application process that the document is available for review and comment. If awarded, the ABCA, once approved, will be placed in the Administrative Record File (ARF) located at City Hall, in St. Marks, Florida. The document may also be placed in additional locations to facilitate public review.

This ABCA provides information on the following:

- Information about Parcel A and the entire SMR site and contamination issues (e.g., exposure pathways, identification of contaminant sources, etc.), cleanup standards, applicable laws, alternatives considered, and the proposed cleanup.
- A discussion of the effectiveness, implementability, and cost of the cleanup methods considered
- An analysis of reasonable alternatives including no action.

## **1.2 Background**

The City of St. Marks is located in Wakulla County, roughly 18 miles south of Tallahassee in Florida's Big Bend region where the state's Gulf coastline changes from a north-south direction to an east-west direction. With a total area of 1.9 square miles and a population of just 317 residents, St. Marks is the only city on the St. Marks and Wakulla Rivers, which are recognized as Outstanding Florida Waterways. The City of St. Marks has officially been designated as a Waterfronts Florida Program Community. The St. Marks River is designated by the Florida Department of Environmental Protection (FDEP) as an "Outstanding Florida Waters" under authority of Section 403.061 (27), Florida Statutes. FDEP gives this designation only to rivers or other water bodies that are worthy of special protection because of their natural attributes. The City is also home to the St. Marks National Wildlife Refuge Center and the historic St. Marks Lighthouse, operated by the Fish and Wildlife Service. Uplands forests, forested swamps, fresh & brackish water marshes and a pristine salt water estuary ecosystem compose this unique area of Florida's Gulf Coast, making the refuge a favorite for birders and outdoor enthusiasts alike.

The entire SMR site comprises approximately 55 acres, containing two parcels of industrialized property (Eastern and Western Parcels) just north of downtown St. Marks, Florida located in Section 02, Township 4 South, Range 01 East, as referenced on the U.S. Geological Survey



(USGS) "Saint Marks, FL", 7.5-minute series Quadrangle map (See Figure 1). The site is bounded to the north by several vacant parcels, Murphy Oil Terminal and the McKenzie Tank Lines, to the west by Woodville Hwy (SR 363), to the south by the City of Tallahassee's Purdom Power Plant and to the east by the St. Marks River. The subject property (including parcel lines) and adjacent area is outlined on Figure 2.

Previous uses of the property were identified through research conducted as part of a Phase I Environmental Site Assessment (ESA) conducted by T N & Associates – Oneida Total Integrated Enterprise (TN&A-OTIE) for the subject site in August 2009; Non-residential, historical land uses of significance on the subject site are as follows:

- 1954 Seminole Asphalt Refining LTD
- 1967 Seminole Asphalt Refining, Inc.
- 1979 Seminole Refining, Inc.
- 1983 W. D. Refining Company, Texas
- 1985 Seminole Refining Corporation (facility closes)
- 1992 St. Marks Refining, Inc.
- 1992 St. Marks Refinery Incorporated

Based on the above historical land-uses/occupants of the site, the Phase I ESA identified the former ATS's and processing areas consisting of a refined product storage area, a process area, a waste asphalt pond, petroleum tanks, and refinery equipment as recognized environmental conditions (REC's) requiring further assessment.

### **1.3 Review of Previous Site Assessments**

As part of the Phase I ESA conducted for the subject site, TN&A-OTIE indicates the following historical assessment documents were reviewed as part of the Phase I ESA conducted on behalf of EPA:

ASTDR, June 2002, Health Conclusions St. marks refinery

EarthTech, March 2005, St. Marks Refinery Site Assessment

EarthTech, March/April 2006, St. Marks Refinery Remediation Action Summary

EeathTech, November 2006, St. Marks Refinery First Semi Annual Natural Attenuation Monitoring Report, Year 1

EarthTech, January 2009, St. Marks Refinery Semi-Annual Natural Attenuation Monitoring Report, Year 3 —Event 4



The results of these assessments as summarized by TN&A-OTIE are as follows:

#### **ATSDR June 2002**

ASTDR performed several tests and found elevated concentrations of dioxins, pentachlorophenol; benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, dibenzo[a,h]anthracene, indeno[1,2,3-cd]pyrene, 2-methylnaphthalene, 2-methylphenol, aluminum, arsenic, manganese, and benzene. It was suggested that the pentachlorophenol may be from the neighboring former Iacon wood treatment facility. ATSDR also reported that the dioxin may be from the incinerator that operated on the Subject Site prior to 1985. There was no other mention of an incinerator in the supplied historical reports or figures. The ATSDR report concludes that the Subject Site is categorized as a "No Apparent Public Health Hazard" for adult workers and visitors. Workers are not being exposed to contaminants at doses high enough to cause adverse health effects. Also..."The St. Marks Refinery site is categorized as an "Indeterminate Public Health Hazard" for the surrounding community. There is no evidence that workers or local residents are being exposed to groundwater contamination from the St. Marks Refinery site. However, the extent of contamination of surface soil and groundwater has not been adequately characterized. Residents have reported rainwater runoff from the St. Marks facility draining into ditches and yards around the site. Off-site surface soil sampling would likely detect contaminants carried from the site to off-site locations. Shallow groundwater can also carry contaminants from the site to off-site locations."

#### **Earth Tech, Inc. Environmental Site Assessment (ESA) Report 2005**

An ESA was conducted in 2004 by Earth Tech, Inc. (ET), under the direction of FDEP. During this ESA, several RECs were recognized and are listed below:

- ET identified 21 potential source areas at the Subject Site. These potential source areas included the former refinery areas, ASTs, former site structures, and a series of waste ponds. In all, 648 soil, sediment, groundwater, and surface water samples were collected and 226 temporary monitoring wells were installed.
- Laboratory analytical results of the samples indicated that soil, sediment, groundwater, and surface water have been impacted by past site activities. Contaminants of concern include dioxins, metals, TPH, VOCs, and semivolatile organic compounds (SVOCs).

- Almost all soils on the developed portions of the Subject Site have been impacted by one or more of the contaminants of concern. Dioxin, arsenic, vanadium, and TPH are the most widespread. In general, where the soil is impacted, the impacts are from land surface to at least the depth of the water table.
- Sediments in the off-site drainage swales that run along SR363 were impacted by dioxins. The on-site ponds were impacted by dioxins, metals, TPH, VOCs, and SVOCs. The sediments in the wetlands were also impacted by dioxins, metals, TPH, and SVOCs.
- Groundwater at the site was impacted significantly by TPH, VOCs, and SVOCs and to a lesser degree by dioxins and metals. Groundwater concentrations, above GCTLs, were identified on residential properties to the north of the site, along the southern property boundary and adjacent to the wetlands on the eastern edge of the developed portion of the Subject Site.
- Surface water in the off-site drainage swales that run along SR 363 were impacted by dioxins and metals. The surface water in the on-site ponds, storm water features, and wetland areas were also impacted by dioxins and metals.
- Five light non-aqueous phase liquid (LNAPL) plumes were identified at the Subject Site. The combined size of these plumes is approximately 16,000 square feet or 0.37 acres. Dense non-aqueous phase liquid (DNAPL) were not observed during the ESA activities.

#### **Earth Tech, Inc. Remediation Action Report 2006**

Based on the findings in the ET ESA, FDEP contracted ET to conduct on-site gross contamination reduction and off-site gross contamination removal. During the period of April 10, 2005 through July 5, 2006, ET conducted remedial activities at the site as follows:

- ET completed the demolition and disposal of the Murphy Oil pipeline. The on-site waste ponds were dewatered, the sediments were excavated, and the media was treated prior to disposal. Also, 117 test pits were excavated to delineate the extent of LNAPL in the vicinity of the settling ponds. After delineation was performed, ET conducted excavation of the on-site LNAPL impacted areas. Clearing, grubbing, excavation, and disposal of on-site and off-site (Purdum) dioxin impacted areas were completed.
- ET constructed two caps over dioxin impacted areas near the southern portion of the site. ET also constructed a perimeter berm to contain storm water on site. Finally,

ET completed backfilling, grading of excavated areas and restoration of wetlands affected by excavation activities. Prior to demobilization, ET installed monitoring wells for long-term groundwater monitoring and a perimeter fence surrounding the Subject Site.

#### **First Semi-Annual Natural Attenuation Monitoring (NAM) Report, Year 1 – 2006**

The FDEP contracted ET to conduct Semi-Annual NAM for groundwater contamination from April 2006 to December 2008. Ground water analytical results from the December 2008 sampling event indicate contamination greater than Chapter 62-777, Florida Administrated Code (FAC), GCTLs for VOCs, SVOCs, metals, and total recoverable petroleum hydrocarbon (TRPH) is currently limited to the area within the berm, the dock area, and along the Purdom property boundary. Concentrations exceeding natural attenuation default concentration (NADC) levels are limited to the interior portion of the Subject Site and dock area.

#### **Semi-Annual Natural Attenuation Monitoring (NAM) Report, Year 5 – 2010**

**The FDEP contracted ADCOM Technical Services, Inc. (AECOM) to conduct** Semi-Annual NAM for groundwater contamination. The groundwater sampling even was performed on July 19, 2010. Groundwater samples collected during this period indicated contamination greater than Chapter 62-777, FAC, GCTLs for volatiles, semivolatiles, metals and TRPH is currently limited to the area within the berm, the dock area, and along the Purdom property boundary. Concentrations exceeding natural attenuation default concentration (NADC) levels are limited to the interior portion of the Subject Site and dock area.

## **2.0 Applicable Regulations and Cleanup Standards**

The Florida Department of Environmental Protection (FDEP) will provide regulatory oversight of all assessment and remediation conducted at the subject site. Daily direct oversight of assessment and remediation activities will be performed by a State of Florida licensed professional engineer or professional geologist, competent through education and experience to provide direction and oversight throughout the process. Additional review and regulatory oversight will be provided by the EPA Project Officer administering the grant activities. Copies of all reports generated throughout the process will be submitted to both the FDEP and EPA for review and comment. In addition, Quarterly Reports will be submitted to the EPA Project Officer to document progress on the project.

Consistent with criteria specific in Chapter 62-780, FAC, the lower of the Florida R-SCTL and Leachability Based on Groundwater ( $L_{GW}$ -SCTL) will be the soil contamination screening and remediation standards for this project. However, given the extent and magnitude of the previously detected COC's, it is anticipated that remedial measures will be implemented using risk-based corrective actions RMO-3, by capping, providing engineering and institutional controls (EC/IC's) to be protective of human health and the environment.

The Florida GCTLs specified in Chapter 62-777, FAC will be the groundwater contamination screening and remediation standards for this project. Based on data collected during the previous site assessments and current FDEP approved Natural Attenuation Monitoring Plan, alternative groundwater cleanup standards will be established for site-specific COC's, followed by use of RMO-3 utilizing EC/IC's to control groundwater use/withdrawal.

The referenced soil and groundwater cleanup target levels from Chapter 62-777, FAC is provided for reference. A copy of the applicable cleanup target levels is available at [http://www.dep.state.fl.us/waste/quick\\_topics/rules/default.htm](http://www.dep.state.fl.us/waste/quick_topics/rules/default.htm).

In summary, the overriding cleanup objectives for the SMR site will be designed to be protective of human health and the environment, based on anticipated commercial/industrial (proposed photovoltaic solar energy generation facility and marine industrial/commercial facility) and will comply with applicable State and Federal laws.

## **3.0 Exposure Analysis**

### **3.1 Evaluation**

Preparation of an ABCA requires an evaluation be made as to the possible corrective actions and their respective costs to remedy effected areas. Not all remedies are physical or chemical and may include other types of remedies such as institutional controls (e.g. restriction on residential development recorded on the deed). Excess public risk requires four factors, all of which must be present to produce excess risk from contaminants at a site. These are:

- A chemical with sufficient toxicity to do harm (whether acute or chronic)
- A sufficient quantity of the chemical to be toxic and do harm
- A receptor on which to do harm, and

- A pathway by which a sufficient amount of the contaminant can actually reach a receptor and do harm

Corrective actions to remedy affected areas rarely eliminate all chemicals of concern. It is generally the intent to remove, treat or immobilize the concentrations of chemicals of concern to levels producing an acceptable risk to human health and the environment. The degree of acceptable risk has to be determined by the public through legislative and regulatory processes. This has been accomplished by the development and implementation of FDEP regulatory programs to implement State standards (Chapter 62-777, FAC, the Contaminant Cleanup Criteria rule).

### **3.2 Exposure Pathways**

In order for possible contaminants of concern to do harm to public health or the environment, they must occupy a point of exposure accessible to the population at risk. Compounds to which populations are not currently, or likely to be exposed via complete exposure pathways do not constitute a probable condition of elevated risk. The three potential receptor populations are:

- Construction worker – persons involved in the redevelopment of the property
- Industrial/commercial worker – persons who occupy the property under conditions of full-time employment
- Residents – persons who reside on or adjacent to the property
- Potential Vapor Intrusion Condition (pVIC) for existing or proposed onsite structures

Based on assessment data detailed in **Section 1.3**, the primary contaminants of concern (COCs) in soil heavy metals, dioxins, pentachlorophenol; carcinogenic poly nuclear aromatic hydrocarbons (benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, dibenzo [a,h]anthracene, indeno[1,2,3-cd]pyrene, 2-methylnaphthalene), 2-methylphenol, TPH and benzene. Risk of exposure to the site soils were examined for three potential receptor populations deemed most likely to be exposed to identified contaminants of concern. The primary exposure pathways identified at this site include dermal/mucosal contact, ingestion of site soils and inhalation of potential fugitive dust emissions/vapors during site remediation and redevelopment activities.

Based on the groundwater data detailed in **Section 1.3**, the primary COC's in groundwater are metals, VOC's, SVOC's, and dioxins. No potable wells reportedly exist on the subject site or adjacent properties, no irrigation wells are planned at the site and potable water is available

from the City of Tallahassee; therefore, a completed pathway for the ingestion of site groundwater does not appear to be present.

The combination of elevated concentrations of dioxins, VOCs, and SVOCs in groundwater, coupled with shallow groundwater depths (less than 2 feet), indicate the existence of a chemical pVIC with respect to existing and potential future Subject Site buildings. The current extent of groundwater contamination may not be fully delineated. Therefore, the entire extent of the Subject Site should be considered subject to this pVIC.

The existence of petroleum ASTs and prior occurrence of surface spills and fires of petroleum substances indicate a pVIC related to petroleum. The Semi-Annual NAM for groundwater contamination December 2008 indicated contamination greater than Chapter 62-777, FAC, GCTLs for VOCs, SVOCs, metals, and TRPH. The contamination is currently limited to the area within the bermed area and along the Purdom property boundary of "Parcel B" and the dock area "Parcel A". A chemical and petroleum pVIC exists across the entire Subject Site with respect to existing and potential future Subject Site buildings because of confirmed dioxin, VOC, and SVOC contamination in groundwater beneath the Subject Site due to existence of one or more historical chemical/petroleum surface releases on the Subject Site. Proposed redevelopment of the site is a photovoltaic solar field and **does not** include construction of additional interior buildings; therefore, a completed pathway for the migration of volatile contaminant vapors appears limited.

## **4.0 Evaluation of Cleanup Alternatives**

### **4.1 Cleanup Alternatives Development**

Based on the evaluation of assessment findings presented in this ABCA and assumptions of future site use for photovoltaic solar power generation facility, various alternatives were considered for managing the identified impacts, as discussed below:

### **4.2 Soil Remedial Alternatives**

The alternatives for mitigating the risks associated with identified contaminated soil for both parcels are outlined in the following sections. A brief discussion of each alternative is provided below. For identified soil impacts, the following four remediation alternatives were evaluated for this site.

- No Further Action

- Capping (Engineering Control)
- In-situ Solidification/Stabilization
- Excavation and Offsite Disposal

Each of these alternatives has been evaluated with respect to effectiveness, implementability, and cost. The following sections provide a synopsis of each technology and the final evaluation results.

#### **4.2.1 No Action**

##### **Technology Description**

The No Action option involves leaving the site in essentially its current condition, with no remediation activities being performed prior to development.

##### **Effectiveness**

This option may be considered for the entire site or portions of the site deemed to be undevelopable or for other areas of the site already remediated by FDEP. FDEP contractors have removed thousands of tons of impacted soil and constructed two capped soil containment areas for the onsite management of previously identified dioxin impacted soils.

##### **Implementability**

The No Action alternative would be easy to implement because it requires no significant additional activities be performed on the site. Fencing and/or warning signs (i.e., engineering controls) may be required if contaminants are left unabated. In addition, institutional controls such as deed restrictions or use restrictions will be implemented. For the purposes of this ABCA, institutional controls and engineering controls will be considered an element of the No Action alternative.

##### **Cost**

As considered within this document, there would be minimal cost associated with implementing No Action alternative at the site. If warning signs or other access control measures were considered for portions of the facility, then the cost for signs and fences, etc. would be approximately \$7,500 – \$10,000 per year, plus the costs to maintain any EC/IC's.

#### **4.2.2 Capping (Engineering Control)**

##### **Technology Description**

Capping involves placing an impermeable cover over contaminated materials. Caps do not clean up the contaminated material. Instead, they isolate the contaminated media and keep it in place so it will not come into contact with people or the environment.

### **Effectiveness**

If designed appropriately, a cap can be effective in 1) stopping rainwater from seeping through contaminated material and carrying the contamination into groundwater or surface water features, 2) stopping wind from blowing contaminants throughout the site or off site, and 3) keeping people and animals from coming into direct contact with the impacted material.

### **Implementability**

Cap design can range from the simple placement of a single layer of soil/clay an asphalt cover the materials of concern to multilayer systems. The top layer is typically comprised of soil and vegetation to stabilize the site, uptake moisture, and prevent erosion. The second layer is typically comprised of a drainage system (pipes, gravel, etc.) to manage water the seeps through the top layer. A gas venting system is often placed beneath the drainage system, depending on the nature of the waste and potential for pVIC. The bottom layer is typically impermeable material; either clay or a geotextile barrier.

While construction and maintenance of a cap is generally simple to implement, it could be potentially cost prohibitive for the entire property for several reasons. First, the documented impacts to soils appear to be too significant in areal extent to support large scale capping without incorporating capping with the overall site redevelopment activities. With the buildable areas of the site exceeding over 27 acres (considerable more if onsite drainage features are reconfigured), imported fill/cap material volumes could exceed 90,000 -120,000 cubic yards of material.

Second, the site re-grading that will be required to complete installation of the proposed photovoltaic solar field, underground utilities, re-align roads and construct new stormwater ponds throughout the site make the construction and maintenance of a cap system integral to incorporation into the overall site redevelopment.



## **Cost**

Multi-layer capping systems can range from approximately \$80,000 to \$120,000 per acre, depending on the design. Based on the final redevelopment/remedial strategy for the site, if only limited portions of the subject site would be subject to capping, the limitations outlined in the implementability discussion render further consideration of capping practicable, particularly if incorporated with other remedial/site redevelopment activities.

### **4.2.3 In-situ Solidification/Stabilization**

#### **Technology Description**

Solidification/stabilization is a cleanup method that prevents or slows the release of contaminants from impacted soils or sludge. Due to the presence of arsenic impacts in addition to PAH and dioxin contaminants, this technology was evaluated over other methods of in-situ treatment such as bioremediation (which would not address arsenic impacts effectively). This technology does not typically destroy the contaminants; rather, it prevents them from moving into the surrounding environment. Typically, cement or similar binding agents are used to solidify the impacted soil or sludge. Stabilization; however, may only consist of a chemical reagent that binds contaminants to the subsurface media, thereby preventing migration.

#### **Effectiveness**

Solidification/stabilization can be effective if future disturbances of the subsurface will not occur. However, changes in water chemistry can often result in leaching of contaminants from solidified/stabilized material, resulting in impacted groundwater or surface water. An institutional control to prevent future contact with and disturbance of the solidified/stabilized material is typically required. In addition, the effectiveness of this technology (particularly stabilization) relies on the injected stabilizer contacting all impacted material, which may prove difficult.

#### **Implementability**

Solidification involves mixing impacted soil with a substance (like cement) that causes the soil to harden. Soil mixing can be performed in-situ using large augers (deep) or land farming techniques (shallow), or the impacted soils can be excavated and mixed with binding agents ex-situ. Once the ex-situ mixture dries to form a solid block or granular aggregate, it can be returned to the site (left in place) or removed to another location.

Stabilization typically involves the injection of chemicals that bind with the contaminated material to (in theory) render the material inert or non-leachable. Soils could be left in place beneath

planned parking lots; however, leaving solidified soils in areas where residential buildings are to be constructed (including related buried utilities) could be problematic. Also, due to the shallow water table solidified/stabilized material would be in direct contact with potentially acidic or highly mineralized water common in Florida; such contact may over time weaken the solidified/stabilized matrix, increasing potential leaching and exposure concerns. For these reasons, solidification/stabilization is considered impractical for this project.

### **Cost**

The cost to solidify impacted material is directly related to the amount of material being addressed, the nature of the binding agent(s) used, and the final disposition of the solidified material. Additionally, costs for cement-based stabilization techniques may vary according to availability and short term cost variability for concrete, and the chemical nature of the contaminant. Published costs for solidification/stabilization include \$65 to \$105 per cubic yard for shallow applications typical of the subject site. Assuming several hundred thousand cubic yards of material (includes safety factor for additional soil encountered during work) were solidified or stabilized in-place, the associated cost would exceed ten million dollars and therefore not practical.

## **4.2.4 Excavation and Offsite Disposal**

### **Technology Description**

Excavation is digging up impacted soils from a site. Offsite disposal requires detailed characterization of the waste characteristics, contamination levels, identification of the appropriate disposal or treatment facility, and a determination of transportation issues associated with transfer of the material (site access and distance to the disposal or treatment facility).

### **Effectiveness**

Removal of contaminated material from a site is typically the most effective remediation technology that can be implemented, as it does not rely on chemical processes, dispersion and contact with reagents or binders, or soil conditions and is effective regardless of contaminant type (i.e. VOCs, SVOCs, metals, etc.)

### **Implementability**

Many factors affect the implementability of a soil excavation project. Access must be available to remove the impacted material and an appropriate treatment or disposal facility must be

identified that can manage the levels and types of contamination. Generally, excavation is limited to materials that are unconsolidated and easily removed using backhoes, excavators, and similar equipment. The depths of excavation are also typically limited to approximately 20-ft, unless shoring or benching is implemented to access deeper soils. Shoring can be difficult in some instances, and benching can result in substantially increased volumes of soil being managed.

Lastly, if excavation is extended below the water table, dewatering of the excavation area is required and treatment of impacted groundwater is typically an additional component of the project. These factors can affect the cost and implementability of excavation at a given location.

### **Cost**

The cost of excavation can vary widely based on the variables discussed above. Additionally, transportation and disposal costs offsite can also vary substantially based on the method of treatment or disposal, fuel costs, and the distance to the final disposal facility. Costs are typically separated based on the following tasks: excavation and staging of material, transportation and disposal, and backfilling and compaction. While costs can vary significantly, the following costs reflect recent excavation from above the water table, and transportation to a permitted disposal facility; typical costs range from \$65 - \$105 per ton not including project management, laboratory analysis, and regulatory negotiations.

Areas of subsurface impacts have been documented throughout the subject site and the extent of those impacts has not been fully delineated at this time. In addition, excavation in some untested areas may be required during site grading activities (soils that will be evaluated to determine if they are impacted prior to offsite disposal). Therefore, it is difficult to accurately estimate the volume of impacted soils that may require action at this time and, as a result, the costs associated with excavation and disposal activities. However, for budgetary and comparison purposes if a volume of 100,000 cubic yards was anticipated, associated remedial costs would exceed seven million dollars, and therefore not practical.

### **4.3 Groundwater Remedial Alternatives**

While contaminant impacts to groundwater have been identified in on both parcels, sufficient delineation of the identified impacts has been conducted to date. Currently the FDEP is conducting the final phases of the state-funded long-term natural attenuation groundwater

monitoring program for both sites. Based on the extent and magnitude of the groundwater plumes cost effective groundwater remedial remedies are not practical at this time, other than continued monitoring. Long-term natural attenuation/monitoring are an effective and FDEP approved remedial approach. Due to a lack of current or proposed future use of the shallow groundwater at the site, active remediation will likely not be pursued. However, long-term monitoring and possible use of passive vapor mitigation/monitoring may be necessary if occupied structures are constructed over portions of the plume exhibiting pVIC. General cleanup and mitigation options include:

- No Action
- Institutional/Engineering Controls
- Various in-situ & ex-situ options
- Natural Attenuation/Long-term Monitoring

## **5.0 Final Remedy Selection**

Based on this Draft ABCA evaluation, a combination of remedial alternatives is anticipated to provide the most cost effective remedial strategy for both parcels. Due to the limited remedial budgets available for these sites, a combination of excavation with off-site disposal, capping (with use of IC/EC's) and No Action are chosen as the remedies best suited to achieve the goals of protecting human health and the environment at this site. Other than the No Action alternative, the singular use of the other methods outlined above, remedial costs would far exceed any collectively available funding; FDEP has currently expended an estimated 22 million dollars addressing these parcels. The proposed remedy for each site has the best long-term reliability of the methods evaluated because it will allow a phased redevelopment strategy. The proposed remedial strategy includes: removal isolated "hotspots" via excavation and offsite disposal, capping other impacted areas (and/or incorporated into subsequent redevelopment activities) and provide a No Action alternative to portions of the site deemed to be undevelopable, or where the FDEP has previously completed remedial actions. The anticipated remedial costs are outlined below for the Eastern Parcel of the SMR site.

### **Eastern A**

**Soil Impacts** - This parcel consists of approximately 8 acres of waterfront uplands, former terminal loading dock/pier and adjacent wetlands suitable for redevelopment as marine sales/service or other marine commercial/industrial end-uses. Previous soil excavation activities have addressed several areas on the Eastern Parcel. However, soil impacts remain in

the vicinity of the former AST's, petroleum product piping/off-loading areas and along Rattlesnake Branch creek. The anticipated remedial strategies for this site include removal of arsenic, barium, cadmium, selenium, vanadium, and petroleum impacted soil from three "hotspots" and capping approximately 1.26 acres with 2-feet of clean fill material and the No Action alternative for the remaining undevelopable areas of the site. Anticipated costs are outlined below:

• Programmatic Support (outreach/CRP/QAPP/HASP)	\$20,000
• Remedial Planning/ABCA	\$20,000
• Source Removal Activities 500 tons @ \$85/ton	\$42,500
• Confirmatory Sampling	\$10,000
• Backfill and Capping 4,375 cubic yards @ \$20/cy	\$87,500
• Preparation of EC/IC documentation	<u>\$20,000</u>
Estimated Total Costs	\$200,000*

Notes: \* If additional soil impacts are encountered during site redevelopment beyond those currently identified, remedial measures will be addressed through onsite management and supplemental capping conducted by the end-user.

### **Groundwater Impacts**

As previously discussed, the final groundwater remedy is anticipated to include continued FDEP approved monitoring and establishing an institutional control (deed restriction) to prevent groundwater use.

Notes: \* If additional soil impacts are encountered during site redevelopment beyond those currently identified, remedial measures will be addressed through onsite management and supplemental capping conducted by the end-user. The costs associated with the capping and construction of the necessary infrastructure to facilitate the completion of the proposed solar farm cannot be estimated until completion of the necessary site civil engineering design.

**City of St. Marks - Former St. Marks Refinery – East Parcel**  
**FY14 USEPA Brownfields Cleanup Grant Application**

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**APPENDIX F**  
**COST-SHARE**  
**HARDSHIP WAIVER**

City of St. Marks  
FY14 USEPA Brownfields Cleanup Grant Application  
Former St. Marks Refinery – Eastern Parcel

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**Appendix F – Hardship Waiver Request for City 20% Match**

The City is requesting \$200,000 in cleanup funds and a hardship waiver for the City's contribution match of 20% of \$40,000 to begin cleanup activities for the Eastern Parcel of the former St. Marks Refinery. The Eastern Parcel consists of 8 acres, more or less along the banks of the St. Marks River and has impacted the water body over the years while in operation and continues today. The St. Marks River is designated by the Florida Department of Environmental Protection (FDEP) as an "Outstanding Florida Waters" under authority of Section 403.061 (27), Florida Statutes. FDEP gives this designation only to rivers or other water bodies that are worthy of special protection because of their natural attributes. The proposed funding will be used to address cleanup activities at the site, including development of a site specific QAPP and a site health and safety plan, preparation of a remedial action plan, excavation or capping of contaminated soils, placement of applicable institutional/engineering controls, use of back fill of clean soil and confirmatory soil sampling.

The Parcel consists of waterfront uplands, former terminal loading dock/pier and adjacent wetlands suitable for redevelopment as marine sales/service or other marine commercial/industrial end-uses. The far eastern portion of the adjacent West Parcel contains a man-made impoundment area built by FDEP which compounds efforts to redevelop the entire parcel. The impoundment area was initially constructed as an environmental engineering control to control potentially impacted surface water and soil from leaving the property. The successful cleanup/redevelopment of this site will stimulate economic and community redevelopment, increase open space/greenspace, and help to resolve environmental justice inequalities in an area that has inherited a very negative environmental legacy. The revitalization of this site will demonstrate how other blighted properties can be successfully reborn into sustainable, productive developments within the City and lead to greater and diverse employment opportunities.

The City of St. Marks is a poor community, hit hard by challenging economic times, recent natural disasters and the steady loss/erosion of its employment base. In addition to the toll of heavy industry, mining and timber productions has had on the community, St. Marks has faced the devastating effects of a number of hurricanes. In fact, 35 hurricanes have landed within 25 miles of St. Marks since 1852. The most recent of these, Hurricane Dennis, hit in 2005 and laid claim to some of the oldest businesses in the area. Many of which have not been rebuilt. The City currently has less than 15 businesses in operation. To compound these challenges, the City is facing enormous environmental concerns it does not have any hope of financing on its own. **With general operating funds of just \$256,762, the City operates on finite resources.** With a population of just 293 people, the City of St. Marks is also one of the smallest in terms of population for the state, ranked 387 out of 410 Florida Cities. A steady decline in population has left nearly 20% of residential properties vacant according to the findings of the City's Redevelopment Planning process. City officials estimate that approximately 18% of residents are currently unemployed. The number would be much higher if it included those that are currently under-employed or have been out of the workforce for such a length of time as to drop from the workforce rolls. High vacancy rates and little employment opportunity have limited the City's ability to redevelop its community. Without the hardship waiver, the City cannot financially afford to address the environmental concerns of the subject property.

**APPENDIX G**

**SPECIAL CONSIDERATIONS**



City of St. Marks - Former St. Marks Refinery – East Parcel  
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APPENDIX G  
SPECIAL CONSIDERATIONS

	Other Factor	Page #
X	Community population is 10,000 or less	2
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
	Project is primarily focusing on Phase II assessments.	
	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	
	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities	
	Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <b>applicant must attach documentation</b> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change (also add to "V.D Other Factors")	